

Asbestos Containing Material Removal Incident Millinas Government Complex- North Tower San Juan, Puerto Rico

Background

On Tuesday, May 15, 2012, personnel from the Air Program in Caribbean Environmental Protection Division (CEPD) conducted an asbestos related inspection under NESHAPS at the Minillas Government Complex located at Jose De Diego Ave. and Baldorioty De Castro Avenue, in San Juan, Puerto Rico 00907. This inspection was in response to a complaint received on May 14, 2012. The complaint indicated that construction workers were handling potential Asbestos Containing Material (ACM) debris in an inappropriate manner, as part of a construction (remodeling) on Floor #9. The 17-store building hosts seven Commonwealth Agencies (approximately 1,000 employees) and it is visited by over hundreds of people daily. During the inspection it was found that potential ACM was handled improperly by a private removal contractor resulting on a potential exposure to employees and visitors inside and outside the building. The contractor used the service elevator to transfer uncovered ACM stucco and sheet rock from the working area (Floor 9) to the lower deck (ground area) floor along with other demolition debris on the outside premises. EPA inspector indicated that the ACM evidence is visible throughout the exterior of the building, in the ground level, Floor #9, elevators and stairways. Potential friable asbestos may be present. The inspector requested the company to wet down the ACM to prevent further migration of possible friable materials and to take appropriate measures to protect the employees working in the building.

After the inspection, the Air Program referred this situation to the Emergency Response Team in CEPD. On Wednesday, May 16, 2012, the OSC Rodriguez conducted a removal action assessment together with the Air Program personnel. A total of 21 biased samples were taken in strategic locations to determine the presence of ACM in other areas throughout the building. See table below.

Matrix	Floor	Location	Abestos Type	*Concentration (structures/cm²)
Bulk	9	Ceiling Hall	(5%) Chrysotile	
Bulk	9	Ceiling next to exit door	(4%) Chrysotile	-
Dust	Ground	Exit Door-Hall- Exterior	(<1%) Chrysotile	-
Dust	Ground	Exterior Collection Area	(<1%) Chrysotile	-
Wipe	Ground	Service Elevator Floor Entrance	Chrysotile	48600
Wipe	Ground	Decorative wall	Chrysotile	<14500
Wipe	Ground	Bookshelf	None Detected	
Wipe	7	A/C Reception vent	None Detected	
Wipe	8	A/C Reception vent	None Detected	-
Wipe	8	Elevator Front Frame	None Detected	-

Wipe	9	Floor-Collection area	Anthophyllite / Chrysotile	1310000
Wipe	9	Chair by elevator	Anthophyllite / Chrysotile	19400
Wipe	9	Plastic sheet-exit door	Chrysotile	932
Wipe	9	Light fixture	Anthophyllite / Chrysotile	2920000
Wipe	9	A/C vent by Mechanical room	Anthophyllite / Chrysotile	729000
Wipe	10	Elevator Front Frame	None Detected	
Wipe	10	Secretary desk	None Detected	-
Wipe	11	Elevator Front Frame	None Detected	-
Wipe	11	Secretary desk	Chrysotile	<5830
Wipe	Elevator No.3	Door Frame right	Anthophyllite / Chrysotile	5850
Wipe	Service Elevator	Floor corner	Chrysotile	31200
Laboratory QC	-	-	Chrysotile	<1450

The OSC Rodriguez discussed these results with upper management and Puerto Rico Environmental Quality Board (PREQB) and recommends restricting the access to the building since the concentration of ACM at the main entrance of the building is extremely high. Upper management and PREQB concurred with the recommendation and the Public Building Authority (PBA) was informed over the weekend. PBA is the agency responsible for managing all government buildings. PBA notified all the other head agencies with offices in the building and request to activate their Continuity of Operation Plan to prevent/minimize interruptions of their services. PBA has been extremely cooperative all the time.

Today a meeting between CEPD, CEPD Office of Regional Counsel, PREQB, PBA and PBA's contractors (asbestos removal) was held at CEPD to discuss the action plan to expedite the delineation of the contamination and cleanup of the ACM.

During the meeting several issues were discussed:

- Air Program inspection findings
- Removal Site Assessment findings
- Interim Action taken
- Request for Information

EPA expressed its interest in expedite the assessment and cleanup of the ACM in order to ensure the protection to human health and the environment. PBA discussed among them (contractors and legal representative) the approach to be use to develop an strategy to address EPA concerns.

PBA stated:

- PAB does not admit any liability nor recognize the any threat to human health associated with the ACM; however as a preventive measure PAB is willing to cooperatively work with EPA to address its recommendations.
- PBA will be meeting this afternoon (May 21) to identify additional technical support (including a certified Industrial Hygienist and asbestos removal professionals) to address all the necessary areas of concerns.
- Maintain restricted access to the building until cleanup is completed and confirmation sampling results indicate it is safe.
- PAB is committed to expedite the sampling and cleanup process, to allow restart operations as soon as possible.
- Work on the sealed areas first. Ground area, elevators and floor 9
- Prepare a cleanup plan and present it to EPA for approval

Media

 Several media press expressed interest in the issues. Statements from PBA and EQB are favorable. Fw: Minillas Government Complex Asbestos Response Site, located at Jose De Diego Ave. and Baldorioty De Castro Avenue, San Juan, Puerto Rico 00907

Leah Escobar

Elena Vaouli

05/21/2012 10:14 AM

---- Forwarded by Leah Escobar/R2/USEPA/US on 05/21/2012 10:14 AM -----

From:

Angel Rodriguez/R2/USEPA/US

To.

Mark Maddaloni/R2/USEPA/US@EPA, Leah Escobar/R2/USEPA/US@EPA

Date:

05/20/2012 06:49 PM

Subject:

Fw: Minillas Government Complex Asbestos Response Site, located at Jose De Diego Ave, and

Baldorioty De Castro Avenue, San Juan, Puerto Rico 00907

For your information.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 **US Environmental Protection Agency**

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)

----Forwarded by Angel Rodriguez/R2/USEPA/US on 05/20/2012 06:48PM -----

To: R2 RRC@epa.gov

From: Angel Rodriguez/R2/USEPA/US

Date: 05/16/2012 09:59AM

Cc: Adalberto Bosque/R2/USEPA/US@EPA, Ramon Torres/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, "James" <daloia.james@epa.gov>, Eric Mosher/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Jose Soto/R2/USEPA/US@EPA, Teresita Rodriguez/R2/USEPA/US@EPA Subject: Minillas Government Complex Asbestos Response Site, located at Jose De Diego Ave. and

Baldorioty De Castro Avenue, San Juan, Puerto Rico 00907

Good morning...Folks

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OSC Rodriguez was briefed of the situation later in the afternoon and a determination was taken by CEPD management and personnel to provide for an emergency response assessment by the CERCLA program on the following day to evaluate wether further contamination control actions needed to be in place.

On Wednesday, May 16, 2012, the OSC will conduct a removal action assessment together with the EPA air program personnel. Samples will be taken in strategic locations to evaluate the extend if any of friable ACM migration. The potential exist for closure/evacuation of some of the building's floors as determine by visual observations and the analytical sampling results.

Updates to be provided later on.

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(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)Good

Fw: Minillas Asbestos Release and Evacuation Update

Leah Escobar

Elena Vaouli

05/21/2012 10:14 AM

---- Forwarded by Leah Escobar/R2/USEPA/US on 05/21/2012 10:14 AM -----

From:

Angel Rodriguez/R2/USEPA/US

То

James Daloia/R2/USEPA/US@EPA, Eric Mosher/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Lourdes Rodriguez/R2/USEPA/US@EPA, Teresita

Rodriguez/R2/USEPA/US@EPA, Leah Escobar/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, Ramon Torres/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA, George Pavlou/R2/USEPA/US@EPA

Date:

05/20/2012 06:47 PM

Subject.

Minillas Asbestos Release and Evacuation Update

Good afternoon...Folks

On May 20, 2012, at approximately 1430 hours, OSC Rodriguez requested the Public Buildings Authority (AEP) take the immediate necessary steps to prevent the access to employees and visitors to the North Tower on the Minillas Commonwealth Government Complex.

It is expected that no employee/access will be granted to the AEP management and that evacuation will remain in effect until the facility provides a Work Plan, a Health and Safety Plan and a Sampling plan that must address proper protocols to control contamination migrating from the 9th floor, the appropriate deconning of the impacted other floors and the pertinent clearance sampling as approved by EPA.

On May 21, 2012, a meeting is scheduled with the PRP(AEP) at 0800 hours to discuss the next steps.

Once the cross contamination is addressed and certain necessary actions are taken, CERCLA will deferred the enforcement action to the EPA Air program.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

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(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail) Fw: Centro Minillas Asbestos ER - Preliminary Data Mandatory Evacuation - approximately potential of 2,000 evacuees (EPA to request AEP no access be allowed)

Leah Escobar

Elena Vaouli

05/21/2012 10:14 AM

---- Forwarded by Leah Escobar/R2/USEPA/US on 05/21/2012 10:14 AM -----

From.

Angel Rodriquez/R2/USEPA/US

To

Mark Maddaloni/R2/USEPA/US@EPA, Leah Escobar/R2/USEPA/US@EPA, George

Pavlou/R2/USEPA/US@EPA

Date:

05/20/2012 06:51 PM

Subject.

Fw: Centro Minillas Asbestos ER- Preliminary Data Mandatory Evacuation - approximately

potential of 2,000 evacuees (EPA to request AEP no access be allowed)

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

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-----Forwarded by Angel Rodriguez/R2/USEPA/US on 05/20/2012 06:50PM -----

To: James Daloia/R2/USEPA/US@EPA From: Angel Rodriguez/R2/USEPA/US

Date: 05/19/2012 10:48PM

Cc: Eric Mosher/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, Jose Rotola/R2/USEPA/US@EPA, Lourdes Rodriguez/R2/USEPA/US@EPA, Adalberto Bosque/R2/USEPA/US@EPA, Ramon Torres/R2/USEPA/US@EPA, Teresita Rodriguez/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA, Carolina Jordan-Garcia/R2/USEPA/US@EPA

Subject: Fw: Centro Minillas Asbestos ER- Preliminary Data Mandatory Evacuation - approximately

potential of 2,000 evacuees (EPA to request AEP no access be allowed) (See attached file: 5,19,12- Centro Minillas ER - Preliminary Data,pdf)

(See attached file: 5.19.12- Centro Minillas ER - Preliminary Data.xls) (See attached file: 5.16.12 - Centro Minillas- Bulk and Dust data.pdf) (See attached file: 5.16.12 - Centro Minillas- Wipes data.pdf)

Good evening everyone,

Please review the attached excel database table as it summarizes the asbestos analytical information for all of the collected samples.

Based on this table and to the best of my knowledge I am recommending the entire building be secured. Access must be prevented to regular employees and to anybody else which may be non-asbestos trained removal contractors.

I will be asking the Public Buildings Authority (AEP) to evacuate the premises of non asbestos qualified personnel, to provide a Work Plan, Sampling Plan and a Health and Safety Plan. Beginning immediately no access will be granted to unauthorized personnel.

All of the floors must deconned, and tested for the presence of ACM prior to reoccupation. There is a slight chance that due to the existence of 2 separated A/C distribution systems that the floors starting from the 8th floor down may be ACM free with the exception of the 1st floor which is highly contaminated with friable asbestos. Unfortunately at this time this same 1st floor eliminates the possibility of access to any other floor.

I will be issuing a Field Notice to Federal Interest tomorrow Sunday, May 20, 2012, before noon against AEP. The air program will be issuing a 114 request for information letter this week also against AEP.

I will informed everyone again tomorrow once I talk to AEP to let them know of our findings and of the EPA mandatory instructions compliance requirements.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodriguez On-Scene Coordinator

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T.F

_X

5.19.12- Centro Minillas ER - Preliminary Data.pdf5.19.12- Centro Minillas ER - Preliminary Data.xls

5.16.12 - Centro Minillas- Bulk and Dust data.pdf5.16.12 - Centro Minillas- Wipes data.pdf

Centro Minillas

Leah Escobar Elena Vaouli Brenda Rivera Garcia

05/21/2012 12:15 PM

Hola Brenda!

I am sending this information before I send the emails from EPA with the preliminary data and information on events at Centro Minillas.

I've attached the link to ATSDR's Toxic Substances Portal which includes all the pertinent information regarding asbestos, and at the bottom of the page is the link for the Case Studies in Environmental Medicine and the Grand Rounds in Environmental Medicine. I think both of these will provide very good information for health care providers.

http://www.atsdr.cdc.gov/substances/toxsubstance.asp?toxid=4

here is the link to the ATSDR en Espanol for asbestos:

http://www.atsdr.cdc.gov/es/phs/es_phs61.html

http://www.atsdr.cdc.gov/es/toxfaqs/es_tfacts61.pdf

I will email Dr. Rullan, Ms Toro and you with the site specific information very soon.

Thank you!

Leah

05/21/2012 02:10 PM



RE: Issue in Puerto Rico

Dyken, Jill J. (ATSDR/DCHI/EB) Leah Escobar "Hayes, Lisa (ATSDR/DCHI/EB)", "Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)", Elena Vaouli

This message has been replied to.

Hi Leah, are you and/or Elena available to discuss this afternoon? I'd be happy to help out in any way needed. EPA R2 also has Mark Maddaloni and Chuck Nace, TRW Asbestos Committee members who were very active in the WTC studies – I'd want to make sure they were involved and our response was coordinated with them. Thanks,

Jill

Jill Dyken

ATSDR Division of Community Health Investigations (proposed)
Eastern Branch (Serving Communities in EPA Regions 1, 2, and 3 –
Maine to Virginia)
770-488-0768 office (Mon., Tues., and Thurs.)
(b) (6) telework (Wed. and alternate Fri.)

From: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Sent: Monday, May 21, 2012 2:02 PM
To: Dyken, Jill J. (ATSDR/DCHI/EB)
Cc: Hayes, Lisa (ATSDR/DCHI/EB)
Subject: FW: Issue in Puerto Rico

Importance: High

Per our conversation.

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Monday, May 21, 2012 10:32 AM

To: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Cc: Uveges, Pam S. (ATSDR/DCHI/EB) (CTR)

Subject: Issue in Puerto Rico

Importance: High

Hi Sharon,

Below I've copied and pasted an email on a building in San Juan, PR that EPA has found is contaminated with asbestos. EPA has asked for ATSDR to review the data and discuss potential health implications. I have data I can provide in another email. I was not made aware of this situation until yesterday evening, when the OSC called me at 6:00pm and advised me of the situation. The OSC, Angel Rodriguez, had apparently been advised by his senior management (Division Director and Deputy Regional Administrator- George Pavlou) that ATSDR needs to be made aware of the situation and be part of the assessment. I've also been asked to make PR DOH aware of the situation.

We need to discuss, as there is going to be a need for quick turn around,

as the building is currently closed, and EPA and EQB are suggesting to the building owners that it not be re-occupied until the data can be assessed.

Thank you. Leah

To: R2 RRC@epa.gov

From: Angel Rodriguez/R2/USEPA/US

Date: 05/16/2012 09:59AM

Cc: Adalberto Bosque/R2/USEPA/US@EPA, Ramon

Torres/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, "James" daloia.james@epa.gov, Eric Mosher/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Jose Soto/R2/USEPA/US@EPA, Teresita

Rodriguez/R2/USEPA/US@EPA

Subject: Minillas Government Complex Asbestos Response Site, located at Jose De Diego Ave. and Baldorioty De Castro Avenue, San Juan,

Puerto Rico 00907

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Updates to be provided later on.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

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(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)Good



RE: minor changes to cover letter Dyken, Jill J. (ATSDR/DCHI/EB) Elena Vaouli

05/21/2012 02:30 PM

This message has been replied to.

Thanks Elena,

Actually, we just distributed the PHA electronically – do you think that would be OK in this case as well? If so, I think they would just send the hard copy letter & consult to Denise and we could send everyone electronic copies of both the letter & HC. I think the cover letter itself might not get posted to the Internet. Sorry, now I'm confusing myself – we can work it out later.

...

Jil

From: Elena Vaouli [mailto:Vaouli.Elena@epamail.epa.gov]

Sent: Monday, May 21, 2012 2:06 PM To: Dyken, Jill J. (ATSDR/DCHI/EB)

Subject: Re: minor changes to cover letter

Hi Jill,

Sorry I'm doing a bunch of other things but wanted to get back to you today. Please see minor change in attachment. Please see below for addresses of cc's. I agree that we don't have to cc all the higher ups.

Please use below address for Joe Rotola, Eric Wilson, and Arelene Anderson:

2890 Woodbridge Ave Bldg 205 Bay B Edison, NJ 08837

Please use below address for Angela Carpenter, Mel Hauptman and Denise Zeno

290 Broadway 18th Floor New York, NY 10007

Please use below address for Iran Rodriguez and Carolyn Baker:

26 Federal Plaza Room 4114 New York, NY 10278

"Dyken, Jill J. (ATSDR/DCHI/EB)" <ard@cdc.gov>

Io Elena Vaouli/R2/USEPA/US@EPA

Dale: 05:21/2012 01:44 PM

Subject: minor changes to cover letter

Hi Flena,

One more thing for you to look at -1 know, I'm sorry! I'm going to accept all the changes, but I just wanted to make sure you were OK with how I worded the final paragraph (changing the community involvement to past tense was a little tricky). Also, since Tina wants the letter from me to Denise, do we still need all the cc:'s? And can you provide addresses for them for me? 3

I hope everything finished up well last week and you and Ana had uneventful trips home! Thanks,

Jill

Jill J. Dyken, PhD, PE

Environmental Health Scientist

Agency for Toxic Substances and D'sease Registry

Division of Community Health Investigations (proposed)

Eastern Branch (Serving Communities in EPA Regions 1, 2, and 3 – Maine to Virginia)

Mail and Deliveries: 4770 Buford Highway NE, MS F-59, Atlanta, GA

30341-3717

Toll Free 1 800 CDC INFO Office Direct: 770-488-0768

Telework (Wed. and alternate Fr.): (b) (6)

Fax: 770-488-1547 JDyken@cdc.gov

[attachment

"CaboRojoGWcont-CovLetforHC-CaboRojoPRDCMREVCOMMENTS.docx" deleted by Elena Vaouli/R2/USEPA/US]

RE: Issue in Puerto Rico

Leah Escobar Dyken, Jill J. (ATSDR/DCHI/EB)
Elena Vaouli, "Hayes, Lisa (ATSDR/DCHI/EB)".
"Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)"

05/21/2012 02:50 PM

Hi Jill

Yes both of us are here this afternoon and yes both Chuck and Mark are involved with this evaluation. I understand that they will be using the WTC study to guide them in the re-occupancy.

I still do not have any question and am still waiting to hear from the OSC about what they want us to do.

Thanks

"Dyken, Jill J. (ATSDR Hi Leah, are you and/or Elena available to di... 05/21/2012 02:10:33 PM

From "Dyken, Jill J. (ATSDR/DCHI/EB)" <azd9@cdc.gov>

To Leah Escobar/R2/USEPA/US@EPA

Cc "Hayes, Lisa (ATSDR/DCHI/EB)" < lih1@cdc.gov>, "Williams-Fleetwood, Sharon O.

(ATSDR/DCHI/EB)" <sow1@cdc.gov>, Elena Vaouli/R2/USEPA/US@EPA

Date: 05/21/2012 02:10 PM Subject: RE: Issue in Puerto Rico

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Jill Dyken

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Baldorioty De Castro Avenue, San Juan, Puerto Rico 00907

Good morning...Folks

On Tuesday, May 15, 2012, the EPA air program in CEPD conducted an asbestos related inspection under NESHAPS at the Minillas Government Complex located at Jose De Diego Ave. and Baldorioty De Castro Avenue, in San Juan. Puerto Rico 00907. During the inspection he found that potential ACM material was handled improperly by the ACM removal contractor to the extend that the employees and visitors could have been potentially impacted by breathing asbestos fibers in within the facility and on the outside of the main building. The contractor utilized the service elevator to transfer uncovered ACM stucco and sheet rock from the floors under abatement to bare ground along with other demolition debris on the outside premises. Evidence is visible as stated by the EPA inspector of ACM all over the building exterior as such, potential friable asbestos may be present. The EPA inspector requested the company wet down the ACM to prevent further migration of possible friable materials and to take appropriate measures to protect the employees working in the building. Approximately 2,000 employees work in the complex.

OSC Rodriguez was briefed of the situation later in the afternoon and a determination was taken by CEPD management and personnel to provide for an emergency response assessment by the CERCLA program on the following day to evaluate wether further contamination control actions needed to be in place.

On Wednesday, May 16, 2012, the OSC will conduct a removal action assessment together with the EPA air program personnel. Samples will be taken in strategic locations to evaluate the extend if any of friable ACM migration. The potential exist for closure/evacuation of some of the building's floors as determine by visual observations and the analytical sampling results.

Updates to be provided later on.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)Good

Fw: Asbestos Containing Material Removal Incident

Leah Escobar

Elena Vaouli

05/21/2012 03:29 PM

---- Forwarded by Leah Escobar/R2/USEPA/US on 05/21/2012 03:29 PM -----

From:

Charles Nace/R2/USEPA/US

To

Leah Escobar/R2/USEPA/US@EPA, azd9@cdc.gov

Date:

05/21/2012 03:29 PM

Subject

Fw: Asbestos Containing Material Removal Incident

Leah,

Please find a briefing for the Centro Minillas Asbestos site in Puerto Rico.

Chuck

---- Forwarded by Charles Nace/R2/USEPA/US on 05/21/2012 03:12 PM -----

From:

Ramon Torres/R2/USEPA/US

To

Judith Enck/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, George Pavlou/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Bonnie Bellow/R2/USEPA/US@EPA, John LaPadula/R2/USEPA/US@EPA, Lourdes Rodriguez/R2/USEPA/US@EPA, John LaPadula/R2/USEPA/US@EPA, James Paloia/R2/USEPA/US@EPA, James Daloia/R2/USEPA/US@EPA, Eric Mosher/R2/USEPA/US@EPA, Mary Mears/R2/USEPA/US@EPA, Lisa Plevin/R2/USEPA/US@EPA, Charles Nace/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Beth

Soltani/R2/USEPA/US@EPA

Date:

05/21/2012 12:06 PM

Subject

Asbestos Containing Material Removal Incident

Briefing

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 00968-8069 Office: 787-977-5820 Cel: 787-671-8368

- Asbestos Containing Material Removal Incident.docx

wtc report Leah Escobar

eah Escobar Elena Vaouli

05/21/2012 03:36 PM

http://www.epa.gov/wtc/reports/residential_dust_cleanup_final_report.pdf

Fw: Centro Minillas Asbestos Leah Escobar

Elena Vaouli

05/21/2012 04:16 PM

---- Forwarded by Leah Escobar/R2/USEPA/US on 05/21/2012 04:16 PM -----

From.

Charles Nace/R2/USEPA/US

To

Ramon Torres/R2/USEPA/US@EPA

Cc

James Daloia/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Angel Rodriguez/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, Vince Pitruzzello/R2/USEPA/US@EPA, Michael Moltzen/R2/USEPA/US@EPA, Leah

Escobar/R2/USEPA/US@EPA, Jill Dyken <azd9@cdc.gov>. Robert

Fitzpatrick/R2/USEPA/US@EPA

Date

05/21/2012 04:11 PM

Subject.

Centro Minillas Asbestos

Ramon.

I wanted to give you an update on our progress with Centro Minillas Asbestos. Mark and I have spoken with ATSDR (Leah Escobar and Jill Dyken) to begin to address technical issues that may arise as the project moves forward. The main issues we discussed were:

- (1) The potential cleanup values that could be used to ensure the building is available for rehabitation. Everyone on the call felt comfortable using the clearance criteria that was used for the Lower Manhattan Apartment Cleaning project, 0.0009 f/cc, which is an asbestos concentration in air. The consensus of the group is that indoor air samples will be needed to evaluate the building. If additional wipe samples are collected, we can employ the experience criteria of 5000 s/cm2 but air samples would still be needed to show that the building could be reopened.
- (2) We also discussed the data that would need to be collected. At this time, we feel that the data collection should focus on collecting indoor air samples from the individual floors. However, since we do not have information on the physical characteristics of the building (square footage, office layout, etc.) we feel that it would be best to consult with the selected contractor as they develop the workplan for moving forward. In this manner, we will be able to provide the technical input needed to ensure that we obtain the data necessary to get the building back on line as soon as possible.

George had relayed through Mark that he would like us to remain focused and in touch with the rest of the group on a daily basis (or more frequently if needed). We also would like to bring in Bob Fitzpatrick (our regional NESHAPS guru) as we want to make sure that our technical recommendations will also satisfy the NESHAPS clearance process also.

Please let us know if you have any questions.

Thanks,

Chuck Nace **Environmental Toxicologist**

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

212.637.4164 212.637.3083 - fax nace.charles@epa.gov

Centro Minillas - ACM site in Puerto Rico Leah Escobar sow1, azd9, lih1

Elena Vaouli

05/22/2012 09:15 AM

Hi Sharon

Just wanted to give you an update from yesterday. EPA Risk Assessors, Mark Maddaloni and Chuck Nace requested ATSDR assistance with two issues- determining an appropriate clean up value for re-occupancy of the building and the data that needs to collected. EPA (Nace and Maddaloni) and DCHI staff (Dyken, Graziano and Vaouli) participated in a conference call yesterday on this issue. DCHI advised EPA it can offer technical assistance on this site and will participate in conference calls to move these issues forward. The building remains closed at this time.

We'll put updates in the weekly report.

Thanks Leah

Wipe	9	Floor-Collection area	Anthophyllite / Chrysotile	1310000
Wipe	9	Chair by elevator	Anthophyllite / Chrysotile	19400
Wipe	9	Plastic sheet-exit door	Chrysotile	932
Wipe	9	Light fixture	Anthophyllite / Chrysotile	2920000
Wipe	9	A/C vent by Mechanical room	Anthophyllite / Chrysotile	729000
Wipe	10	Elevator Front Frame	None Detected	-
Wipe	10	Secretary desk	None Detected	=
Wipe	11	Elevator Front Frame	None Detected	(-)
Wipe	11	Secretary desk	Chrysotile	<5830
Wipe	Elevator No.3	Door Frame right	Anthophyllite / Chrysotile	5850
Wipe	Service Elevator	Floor corner	Chrysotile	31200
Laboratory QC	-	-	Chrysotile	<1450

The OSC Rodriguez discussed these results with upper management and Puerto Rico Environmental Quality Board (PREQB) and recommends restricting the access to the building since the concentration of ACM at the main entrance of the building is extremely high. Upper management and PREQB concurred with the recommendation and the Public Building Authority (PBA) was informed over the weekend. PBA is the agency responsible for managing all government buildings. PBA notified all the other head agencies with offices in the building and request to activate their Continuity of Operation Plan to prevent/minimize interruptions of their services. PBA has been extremely cooperative all the time.

Today a meeting between CEPD, CEPD Office of Regional Counsel, PREQB, PBA and PBA's contractors (asbestos removal) was held at CEPD to discuss the action plan to expedite the delineation of the contamination and cleanup of the ACM.

During the meeting several issues were discussed:

- Air Program inspection findings
- Removal Site Assessment findings
- Interim Action taken
- Request for Information

EPA expressed its interest in expedite the assessment and cleanup of the ACM in order to ensure the protection to human health and the environment. PBA discussed among them (contractors and legal representative) the approach to be use to develop an strategy to address EPA concerns.

PBA stated:

- PAB does not admit any liability nor recognize the any threat to human health associated with the ACM; however as a preventive measure PAB is willing to cooperatively work with EPA to address its recommendations.
- PBA will be meeting this afternoon (May 21) to identify additional technical support (including a
 certified Industrial Hygienist and asbestos removal professionals) to address all the necessary
 areas of concerns.
- Maintain restricted access to the building until cleanup is completed and confirmation sampling results indicate it is safe.
- PAB is committed to expedite the sampling and cleanup process, to allow restart operations as soon as possible.
- Work on the sealed areas first. Ground area, elevators and floor 9
- Prepare a cleanup plan and present it to EPA for approval

Media

 Several media press expressed interest in the issues. Statements from PBA and EQB are favorable.

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Minillas Asbestos Release and Evacuation Update

James Daloia, Eric Mosher, Mark

Angel Rodriguez to: Maddaloni, Lourdes Rodriguez, Teresita Rodriguez, Leah Escobar, Jose Font,

05/20/2012 06:47 PM

History:

This message has been forwarded.

Good afternoon...Folks

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Once the cross contamination is addressed and certain necessary actions are taken, CERCLA will deferred the enforcement action to the EPA Air program.

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Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch. Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail) Fw: Minillas Government Complex Asbestos Response Site , located at Jose De Diego Ave. and Baldorioty De Castro Avenue , San Juan, Puerto Rico 00907

Angel Rodriguez to: Mark Maddaloni, Leah Escobar

05/20/2012 06:49 PM

This message has been forwarded.

For your information.

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Eng. Angel C. Rodríguez On-Scene Coordinator

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-----Forwarded by Angel Rodriguez/R2/USEPA/US on 05/20/2012 06:48PM -----

To: R2 RRC@epa.gov

From: Angel Rodriguez/R2/USEPA/US

Date: 05/16/2012 09:59AM

Cc: Adalberto Bosque/R2/USEPA/US@EPA, Ramon

Torres/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, "James" <daloia.james@epa.gov>, Eric Mosher/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Jose Soto/R2/USEPA/US@EPA, Teresita Rodriguez/R2/USEPA/US@EPA

Subject: Minillas Government Complex Asbestos Response Site, located at Jose De Diego Ave. and Baldorioty De Castro Avenue, San Juan, Puerto Rico 00907

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(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)Good

Re: Minillas Asbestos Release and Evacuation Update

Angel Rodriguez, James Daloia, Eric Mosher, Mark

George Pavlou to Maddaloni, Lourdes Rodriguez, Teresita Rodriguez, Leah Escobar, Jose Font, Ramon Torres, Judith Enck, Walter

05/20/2012 06:58 PM

Angel, have you had the data reviewed by our risk assessors, ATSDR, and PRDOH before contacting building management.

These kind of decisions require senior management input.

Sent by EPA Wireless E-Mail Services

From: Angel Rodriguez

Sent: 05/20/2012 06:47 PM AST

To: James Daloia; Eric Mosher; Mark Maddaloni; Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar; Jose

Font; Ramon Torres; Judith Enck; George Pavlou

Subject: Minillas Ashestos Release and Evacuation Update

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(787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail) Re: Minillas Asbestos Release and Evacuation Update

Angel Rodriguez, James Daloia, Eric Mosher, Mark

Judith Enck : Maddaloni, Lourdes Rodriguez, Teresita Rodriguez, Leah Escobar, Jose Font, Ramon Torres, George Pavlou

05/20/2012 07:02 PM

Has AEP agreed?

Sent by EPA Wireless E-Mail Services

From: Angel Rodriguez

Sent: 05/20/2012 06:47 PM AST

To: James Daloia; Eric Mosher; Mark Maddaloni: Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar; Jose

Font; Ramon Torres; Judith Enck; George Pavlou

Subject: Minillas Asbestos Release and Evacuation Update

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rodriguez.angel@epa.gov (e-mail)

Re: Minillas Asbestos Release and Evacuation Update

Jose Font to Judith Enck

Angel Rodriguez, Eric Mosher, George Pavlou, James Daloia, Leah
Cc Escobar, Lourdes Rodriguez, Mark Maddaloni, Ramon Torres,
Teresita Rodriguez

05/20/2012 07:40 PM

Judith.

The Executive Director for the Public Building Authority just issued a press release informing employees and visitors among other things, that there will be no access to the North Tower of Centro Minillas until authorization from EQB and EPA is granted.

-----Judith Enck/R2/USEPA/US wrote: -----

To: Angel Rodriguez/R2/USEPA/US@EPA, James

Daloia/R2/USEPA/US@EPA, Eric Mosher/R2/USEPA/US@EPA, Mark

Maddaloni/R2/USEPA/US@EPA, Lourdes Rodriguez/R2/USEPA/US@EPA, Teresita

Rodriguez/R2/USEPA/US@EPA, Leah Escobar/R2/USEPA/US@EPA,

Jose Font/R2/USEPA/US@EPA, Ramon Torres/R2/USEPA/US@EPA,

George Pavlou/R2/USEPA/US@EPA From: Judith Enck/R2/USEPA/US

Date: 05/20/2012 07:02PM

Subject: Re: Minillas Asbestos Release and Evacuation Update

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Sent by EPA Wireless E-Mail Services

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Sent: 05/20/2012 06:47 PM AST

To: James Daloia; Eric Mosher; Mark Maddaloni; Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar; Jose Font; Ramon Torres; Judith

Enck: George Pavlou

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George Pavlou, Angel Rodriguez, James Daloia, Eric

05/20/2012 07:42 PM

Walter Mugdan to Mosher, Mark Maddaloni, Lourdes Rodriguez, Teresita

Rodriguez, Leah Escobar, Jose Font, Ramon Torres,

Co. "Charles Nace"

George -- I know you have asked Mark Maddaloni to review the data. I have also asked Chuck Nace to do the same.

Sent by EPA Wireless E-Mail Services

From: George Pavlou

Sent: 05/20/2012 06:58 PM EDT

To: Angel Rodriguez; James Daloia: Eric Mosher; Mark Maddaloni: Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar; Jose Font; Ramon Torres; Judith Enck; "Walter Mugdan" <mugdan.walter@epa.gov>; "John LaPadula"

<Lapadula.john@cpa.gov>

Subject: Re: Minillas Asbestos Release and Evacuation Update

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Sent: 05/20/2012 06:47 PM AST

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Walter Mugdan, Angel Rodriguez, James Daloia, Eric

05/20/2012 08:16 PM

George Pavlou to Mosher, Mark Maddaloni, Lourdes Rodriguez, Teresita

Rodriguez, Leah Escobar, Jose Font, Ramon Torres,

Co: Charles Nace

Thanks Walter.

Sent by EPA Wireless E-Mail Services

From: Walter Mugdan

Sent: 05/20/2012 07:42 PM EDT

To: George Pavlou; Angel Rodriguez; James Daloia; Eric Mosher; Mark Maddaloni; Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar: Jose Font; Ramon Torres; Judith Enck; "atwork" <mugdan.walter@epa.gov>: "John LaPadula" <Lapadula.john@epa.gov>

Cc: Charles Nace

Subject: Re: Minillas Asbestos Release and Evacuation Update

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RE: Centro Minillas Brenda Rivera Garcia

Leah Escobar

05/21/2012 12:21 PM

Gracias!

b

Brenda Rivera García, DVM. MPH Acting State Public Health Veterinarian & Assistant Director Field Epidemiology Training Program, Epidemiology and Research Office Puerto Rico Department of Health 787-765-2929, ext. 3562 787-399-9565

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Monday, May 21, 2012 12:16 PM

To: Brenda Rivera Garcia

Cc: Elena Vaouli

Subject: Centro Minillas

Hola Brenda!

I am sending this information before I send the emails from EPA with the preliminary data and information on events at Centro Minillas.

I've attached the link to ATSDR's Toxic Substances Portal which includes all the pertinent information regarding asbestos, and at the bottom of the page is the link for the Case Studies in Environmental Medicine and the Grand Rounds in Environmental Medicine. I think both of these will provide very good information for health care providers.

http://www.atsdr.cdc.gov/substances/toxsubstance.asp?toxid=4

here is the link to the ATSDR en Espanol for asbestos:

http://www.atsdr.cdc.gov/es/phs/es_phs61.html

http://www.atsdr.cdc.gov/es/toxfaqs/es_tfacts61.pdf

I will email Dr. Rullan, Ms Toro and you with the site specific information very soon.

Thank you! Leah

05/21/2012 02:10 PM



RE: Issue in Puerto Rico

Dyken, Jill J. (ATSDR/DCHI/EB) Leah Escobar "Hayes, Lisa (ATSDR/DCHI/EB)", "Wil iams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)", Elena Vaouli

This message has been replied to.

Hi Leah, are you and/or Elena available to discuss this afternoon? I'd be happy to help out in any way needed. EPA R2 also has Mark Maddaloni and Chuck Nace, TRW Asbestos Committee members who were very active in the WTC studies – I'd want to make sure they were involved and our response was coordinated with them. Thanks,

Jill

Jill Dyken

ATSDR Division of Community Health Investigations (proposed)
Eastern Branch (Serving Communities in EPA Regions 1, 2, and 3 –
Maine to Virginia)
770-488-0768 office (Mon., Tues., and Thurs.)

(b) (6) telework (Wed. and alternate Fri.)

From: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Sent: Monday, May 21, 2012 2:02 PM
To: Dyken, Jill J. (ATSDR/DCHI/EB)
Cc: Hayes, Lisa (ATSDR/DCHI/EB)
Subject: FW: Issue in Puerto Rico

Importance: High

Per our conversation.

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Monday, May 21, 2012 10:32 AM

To: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Cc: Uveges, Pam S. (ATSDR/DCHI/EB) (CTR)

Subject: Issue in Puerto Rico

Importance: High

Hi Sharon,

Below I've copied and pasted an email on a building in San Juan, PR that EPA has found is contaminated with asbestos. EPA has asked for ATSDR to review the data and discuss potential health implications. I have data I can provide in another email. I was not made aware of this situation until yesterday evening, when the OSC called me at 6:00pm and advised me of the situation. The OSC, Angel Rodriguez, had apparently been advised by his senior management (Division Director and Deputy Regional Administrator- George Pavlou) that ATSDR needs to be made aware of the situation and be part of the assessment. I've also been asked to make PR DOH aware of the situation.

We need to discuss, as there is going to be a need for quick turn around.

as the building is currently closed, and EPA and EQB are suggesting to the building owners that it not be re-occupied until the data can be assessed.

Thank you. Leah

To: R2 RRC@epa.gov

From: Angel Rodriguez/R2/USEPA/US

Date: 05/16/2012 09:59AM

Cc: Adalberto Bosque/R2/USEPA/US@EPA, Ramon

Torres/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA. "James" <daloia.james@epa.gov>, Eric Mosher/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Jose Soto/R2/USEPA/US@EPA, Teresita

Rodriguez/R2/USEPA/US@EPA

Subject: Minillas Government Complex Asbestos Response Site, located at Jose De Diego Ave. and Baldorioty De Castro Avenue, San Juan,

Puerto Rico 00907

Good morning...Folks

On Tuesday, May 15, 2012, the EPA air program in CEPD conducted an asbestos related inspection under NESHAPS at the Minillas Government Complex located at Jose De Diego Ave. and Baldorioty De Castro Avenue, in San Juan, Puerto Rico 00907. During the inspection he found that potential ACM material was handled improperly by the ACM removal contractor to the extend that the employees and visitors could have been potentially impacted by breathing asbestos fibers in within the facility and on the outside of the main building. The contractor utilized the service elevator to transfer uncovered ACM stucco and sheet rock from the floors under abatement to bare ground along with other demolition debris on the outside premises. Evidence is visible as stated by the EPA inspector of ACM all over the building exterior as such. potential friable asbestos may be present. The EPA inspector requested the company wet down the ACM to prevent further migration of possible friable materials and to take appropriate measures to protect the employees working in the building. Approximately 2,000 employees work in the complex.

OSC Rodriguez was briefed of the situation later in the afternoon and a determination was taken by CEPD management and personnel to provide for an emergency response assessment by the CERCLA program on the following day to evaluate wether further contamination control actions needed to be in place.

On Wednesday, May 16, 2012, the OSC will conduct a removal action assessment together with the EPA air program personnel. Samples will be taken in strategic locations to evaluate the extend if any of friable ACM migration. The potential exist for closure/evacuation of some of the building's floors as determine by visual observations and the analytical sampling results.

Updates to be provided later on.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division. Region 2 US Environmental Protection Agency

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)Good

RE: Issue in Puerto Rico
Elena Vaouli Dyken, Jill J. (ATSDR/DCHI/EB)
Escobar Leah

05/21/2012 02:12 PM

We're around, but Leah just went next door to talk to EPA's Removal Section Chief, Joe Rotola. We should be able to call you once she gets back. (Another PR site for you!!)



Fw: Asbestos Containing Material Removal Incident

Charles Nace to Leah Escobar, azd9

This message has been forwarded.

05/21/2012 03:29 PM

ESSESSED A

Leah.

Please find a briefing for the Centro Minillas Asbestos site in Puerto Rico.

Chuck

---- Forwarded by Charles Nace/R2/USEPA/US on 05/21/2012 03:12 PM -----

From:

Ramon Torres/R2/USEPA/US

To:

Judith Enck/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, George

Pavlou/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Bonnie Bellow/R2/USEPA/US@EPA, John LaPadula/R2/USEPA/US@EPA, Lourdes Rodriguez/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, James Daloia/R2/USEPA/US@EPA, Eric Mosher/R2/USEPA/US@EPA, Mary Mears/R2/USEPA/US@EPA, Lisa Plevin/R2/USEPA/US@EPA, Charles Nace/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Beth

Soltani/R2/USEPA/US@EPA

Date:

05/21/2012 12:06 PM

Subject:

Asbestos Containing Material Removal Incident

Briefing

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 00968-8069 Office: 787-977-5820

Cel: 787-671-8368

- Asbestos Containing Material Removal Incident.docx



Centro Minillas Asbestos

Charles Nace to Ramon Torres

05/21/2012 04:11 PM

James Daloia, Mark Maddaloni, Angel Rodriguez, Walter Mugdan, Cc. Vince Pitruzzello, Michael Moltzen, Leah Escobar, Jill Dyken, Robert Fitzpatrick

History.

This message has been replied to and forwarded.

Ramon,

I wanted to give you an update on our progress with Centro Minillas Asbestos. Mark and I have spoken with ATSDR (Leah Escobar and Jill Dyken) to begin to address technical issues that may arise as the project moves forward. The main issues we discussed were:

- (1) The potential cleanup values that could be used to ensure the building is available for rehabitation. Everyone on the call felt comfortable using the clearance criteria that was used for the Lower Manhattan Apartment Cleaning project, 0.0009 f/cc, which is an asbestos concentration in air. The consensus of the group is that indoor air samples will be needed to evaluate the building. If additional wipe samples are collected, we can employ the experience criteria of 5000 s/cm2 but air samples would still be needed to show that the building could be reopened.
- (2) We also discussed the data that would need to be collected. At this time, we feel that the data collection should focus on collecting indoor air samples from the individual floors. However, since we do not have information on the physical characteristics of the building (square footage, office layout, etc.) we feel that it would be best to consult with the selected contractor as they develop the workplan for moving forward. In this manner, we will be able to provide the technical input needed to ensure that we obtain the data necessary to get the building back on line as soon as possible.

George had relayed through Mark that he would like us to remain focused and in touch with the rest of the group on a daily basis (or more frequently if needed). We also would like to bring in Bob Fitzpatrick (our regional NESHAPS guru) as we want to make sure that our technical recommendations will also satisfy the NESHAPS clearance process also.

Please let us know if you have any questions.

Thanks,

Chuck Nace Environmental Toxicologist

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

212.637.4164 212.637.3083 - fax nace.charles@epa.gov



Re: Centro Minillas Asbestos

Ramon Torres to: Charles Nace

05/21/2012 05:04 PM

James Daloia, Mark Maddaloni, Angel Rodriguez, Walter Mugdan, Vince Pitruzzello, Michael Moltzen, Leah Escobar, Jill Dyken, Robert Fitzpatrick, Jose Font, Carlos Rivera

Thanks Chuck,

I am fine with the approach and recommendations. Please add Carlos Rivera and Jose Font in the email chain.

Take care,

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 20068-8069

Office: 787-977-5820 Cel: 787-671-8368

Charles Nace Ramon, I wanted to give you an update on our pr...

05/21/2012 04:11:12 PM

From: Charles Nace/R2/USEPA/US
To: Ramon Torres/R2/USEPA/US@EPA

Cc. James Daloia/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Angel

Rodriguez/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, Vince Pitruzzello/R2/USEPA/US@EPA, Michael Moltzen/R2/USEPA/US@EPA, Leah

Escobar/R2/USEPA/US@EPA, Jill Dyken <azd9@cdc.gov>, Robert

Fitzpatrick/R2/USEPA/US@EPA

Date: 05/21/2012 04:11 PM Subject: Centro Minillas Asbestos

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Minillas Asbestos Release and Evacuation Update

Angel Rodriguez

James Daloia, Eric Mosher, Mark

Maddaloni, Lourdes Rodriguez, Teresita

Rodriguez, Leah Escobar, Jose Font,

This message has been forwarded.

Good afternoon...Folks

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It is expected that no employee/access will be granted to the AEP management and that evacuation will remain in effect until the facility provides a Work Plan, a Health and Safety Plan and a Sampling plan that must address proper protocols to control contamination migrating from the 9th floor, the appropriate deconning of the impacted other floors and the pertinent clearance sampling as approved by EPA.

On May 21, 2012, a meeting is scheduled with the PRP(AEP) at 0800 hours to discuss the next steps.

Once the cross contamination is addressed and certain necessary actions are taken, CERCLA will deferred the enforcement action to the EPA Air program.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 **US Environmental Protection Agency**

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail) 05/20/2012 06:47 PM

Fw: Minillas Government Complex Asbestos Response Site , located at Jose De Diego Ave. and Baldorioty De Castro Avenue , San Juan, Puerto Rico 00907

Angel Rodriguez

Mark Maddaloni, Leah Escobar

05/20/2012 06:49 PM

This message has been forwarded.

For your information.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

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----Forwarded by Angel Rodriguez/R2/USEPA/US on 05/20/2012 06:48PM ----

To: R2 RRC@epa.gov

From: Angel Rodriguez/R2/USEPA/US

Date: 05/16/2012 09:59AM

Cc: Adalberto Bosque/R2/USEPA/US@EPA, Ramon

Torres/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, "James" <daloia.james@epa.gov>, Eric Mosher/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Jose Soto/R2/USEPA/US@EPA, Teresita Rodriguez/R2/USEPA/US@EPA

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City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)Good Re: Minillas Asbestos Release and Evacuation Update

Angel Rodriguez, James Daloia, Eric Mosher, Mark

George Pavlou Maddaloni, Lourdes Rodriguez, Teresita Rodriguez, Leah Escobar, Jose Font, Ramon Torres, Judith Enck, Walter

05/20/2012 06:58 PM

Angel, have you had the data reviewed by our risk assessors, ATSDR, and PRDOH before contacting building management.

These kind of decisions require senior management input.

Sent by EPA Wireless E-Mail Services

From: Angel Rodriguez

Sent: 05/20/2012 06:47 PM AST

To: James Daloia; Eric Mosher; Mark Maddaloni; Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar; Jose

Font; Ramon Torres; Judith Enck; George Pavlou

Subject: Minillas Asbestos Release and Evacuation Update

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(787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)

Re: Minillas Asbestos Release and Evacuation Update

Angel Rodriguez, James Daloia, Eric Mosher, Mark

Judith Enck Maddaloni, Lourdes Rodriguez, Teresita Rodriguez, Leah

Escobar, Jose Font, Ramon Torres, George Pavlou

05/20/2012 07:02 PM

Has AEP agreed?

Sent by EPA Wireless E-Mail Services

From: Angel Rodriguez

Sent: 05/20/2012 06:47 PM AST

To: James Daloia; Eric Mosher; Mark Maddaloni: Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar; Jose

Font; Ramon Torres; Judith Enck; George Pavlou

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(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)

Re: Minillas Asbestos Release and Evacuation Update

Jose Font Judith Enck

05/20/2012 07:40 PM

Angel Rodriguez, Eric Mosher, George Pavlou, James Daloia, Leah Escobar, Lourdes Rodriguez, Mark Maddaloni, Ramon Torres, Teresita Rodriguez

Judith,

The Executive Director for the Public Building Authority just issued a press release informing employees and visitors among other things, that there will be no access to the North Tower of Centro Minillas until authorization from EQB and EPA is granted.

-----Judith Enck/R2/USEPA/US wrote: -----

To: Angel Rodriguez/R2/USEPA/US@EPA, James Daloia/R2/USEPA/US@EPA, Eric Mosher/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Lourdes Rodriguez/R2/USEPA/US@EPA, Teresita Rodriguez/R2/USEPA/US@EPA, Leah Escobar/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, Ramon Torres/R2/USEPA/US@EPA,

George Pavlou/R2/USEPA/US@EPA From: Judith Enck/R2/USEPA/US

Date: 05/20/2012 07:02PM

Subject: Re: Minillas Asbestos Release and Evacuation Update

Has AEP agreed?

Sent by EPA Wireless E-Mail Services

From: Angel Rodriguez

Sent: 05/20/2012 06:47 PM AST

To: James Daloia; Eric Mosher; Mark Maddaloni; Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar; Jose Font; Ramon Torres; Judith

Enck; George Pavlou

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George Pavlou, Angel Rodriguez, James Daloia, Eric

Walter Mugdan Mosher, Mark Maddaloni, Lourdes Rodriguez, Teresita

Rodriguez, Leah Escobar, Jose Font, Ramon Torres,

05/20/2012 07:42 PM

"Charles Nace"

George -- I know you have asked Mark Maddaloni to review the data. I have also asked Chuck Nace to do the same.

Sent by EPA Wireless E-Mail Services

From: George Pavlou

Sent: 05/20/2012 06:58 PM EDT

To: Angel Rodriguez; James Daloia; Eric Mosher; Mark Maddaloni; Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar; Jose Font; Ramon Torres; Judith Enck; "Walter Mugdan" <mugdan.walter@epa.gov>; "John LaPadula"

<Lapadula.john@epa.gov>

Subject: Re: Minillas Asbestos Release and Evacuation Update

Angel, have you had the data reviewed by our risk assessors. ATSDR, and PRDOH before contacting building management.

These kind of decisions require senior management input.

Sent by EPA Wireless E-Mail Services

From: Angel Rodriguez

Sent: 05/20/2012 06:47 PM AST

To: James Daloia: Eric Mosher; Mark Maddaloni: Lourdes Rodriguez; Teresita Rodriguez: Leah Escobar; Jose

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Walter Mugdan, Angel Rodriguez, James Daloia, Eric

George Pavlou

Mosher, Mark Maddaloni, Lourdes Rodriguez, Teresita Rodriguez, Leah Escobar, Jose Font, Ramon Torres,

05/20/2012 08:16 PM

Charles Nace

Thanks Walter.

Sent by EPA Wireless E-Mail Services

From: Walter Mugdan

Sent: 05/20/2012 07:42 PM EDT

To: George Pavlou; Angel Rodriguez; James Daloia; Eric Mosher; Mark Maddaloni; Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar; Jose Font; Ramon Torres; Judith Enck; "atwork" <mugdan.walter@epa.gov>: "John LaPadula" <Lapadula.john@epa.gov>

Ce: Charles Nace

Subject: Re: Minillas Asbestos Release and Evacuation Update

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From: Angel Rodriguez

Sent: 05/20/2012 06:47 PM AST

To: James Daloia; Eric Mosher; Mark Maddaloni; Lourdes Rodriguez; Teresita Rodriguez; Leah Escobar; Jose

Font: Ramon Torres: Judith Enck; George Pavlou

Subject: Minillas Asbestos Release and Evacuation Update

Good afternoon...Folks

On May 20, 2012, at approximately 1430 hours, OSC Rodriguez requested the Public Buildings Authority (AEP) take the immediate necessary steps to prevent the access to employees and visitors to the North Tower on the Minillas Commonwealth Government Complex.

It is expected that no employee/access will be granted to the AEP management and that evacuation will remain in effect until the facility provides a Work Plan, a Health and Safety Plan and a Sampling plan that must address proper protocols to control contamination migrating from the 9th floor, the appropriate deconning of the impacted other floors and the pertinent clearance sampling as approved by EPA.

On May 21, 2012, a meeting is scheduled with the PRP(AEP) at 0800 hours to discuss the next steps.

Once the cross contamination is addressed and certain necessary actions are taken, CERCLA will deferred the enforcement action to the EPA Air program.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)



RE: Centro Minillas Brenda Rivera Garcia

Leah Escobar

05/21/2012 12:21 PM

Gracias!

b

Brenda Rivera García, DVM, MPH Acting State Public Health Veterinarian & Assistant Director Field Epidemiology Training Program, Epidemiology and Research Office Puerto Rico Department of Health 787-765-2929, ext. 3562 787-399-9565

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Monday, May 21, 2012 12:16 PM

To: Brenda Rivera Garcia

Cc: Elena Vaouli

Subject: Centro Minillas

Hola Brenda!

I am sending this information before I send the emails from EPA with the preliminary data and information on events at Centro Minillas.

I've attached the link to ATSDR's Toxic Substances Portal which includes all the pertinent information regarding asbestos, and at the bottom of the page is the link for the Case Studies in Environmental Medicine and the Grand Rounds in Environmental Medicine. I think both of these will provide very good information for health care providers.

http://www.atsdr.cdc.gov/substances/toxsubstance.asp?toxid=4

here is the link to the ATSDR en Espanol for asbestos:

http://www.atsdr.cdc.gov/es/phs/es_phs61.html

http://www.atsdr.cdc.gov/es/toxfaqs/es_tfacts61.pdf

I will email Dr. Rullan, Ms Toro and you with the site specific information very soon.

Thank you! Leah

05/21/2012 02:10 PM



RE: Issue in Puerto Rico

Dyken, Jill J. (ATSDR/DCHI/EB) Leah Escobar "Hayes, Lisa (ATSDR/DCHI/EB)", "Wil iams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)", Elena Vaouli

This message has been replied to.

Hi Leah, are you and/or Elena available to discuss this afternoon? I'd be happy to help out in any way needed. EPA R2 also has Mark Maddaloni and Chuck Nace, TRW Asbestos Committee members who were very active in the WTC studies – I'd want to make sure they were involved and our response was coordinated with them. Thanks,

Jill

Jill Dyken

ATSDR Division of Community Health Investigations (proposed)
Eastern Branch (Serving Communities in EPA Regions 1, 2, and 3 –
Maine to Virginia)
770-488-0768 office (Mon., Tues., and Thurs.)
(b) (6) telework (Wed. and alternate Fri.)

From: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Sent: Monday, May 21, 2012 2:02 PM
To: Dyken, Jill J. (ATSDR/DCHI/EB)
Cc: Hayes, Lisa (ATSDR/DCHI/EB)
Subject: FW: Issue in Puerto Rico

Importance: High

Per our conversation.

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Monday, May 21, 2012 10:32 AM

To: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Cc: Uveges, Pam S. (ATSDR/DCHI/EB) (CTR)

Subject: Issue in Puerto Rico

Importance: High

Hi Sharon,

Below I've copied and pasted an email on a building in San Juan, PR that EPA has found is contaminated with asbestos. EPA has asked for ATSDR to review the data and discuss potential health implications. I have data I can provide in another email. I was not made aware of this situation until yesterday evening, when the OSC called me at 6:00pm and advised me of the situation. The OSC, Angel Rodriguez, had apparently been advised by his senior management (Division Director and Deputy Regional Administrator- George Pavlou) that ATSDR needs to be made aware of the situation and be part of the assessment. I've also been asked to make PR DOH aware of the situation.

We need to discuss, as there is going to be a need for quick turn around,

as the building is currently closed, and EPA and EQB are suggesting to the building owners that it not be re-occupied until the data can be assessed.

Thank you. Leah

To: R2 RRC@epa.gov

From: Angel Rodriguez/R2/USEPA/US

Date: 05/16/2012 09:59AM

Cc: Adalberto Bosque/R2/USEPA/US@EPA, Ramon

Torres/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, "James" daloia.james@epa.gov, Eric Mosher/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Jose Soto/R2/USEPA/US@EPA, Teresita

Rodriguez/R2/USEPA/US@EPA

Subject: Minillas Government Complex Asbestos Response Site, located at Jose De Diego Ave. and Baldorioty De Castro Avenue, San Juan,

Puerto Rico 00907

Good morning...Folks

On Tuesday, May 15, 2012, the EPA air program in CEPD conducted an asbestos related inspection under NESHAPS at the Minillas Government Complex located at Jose De Diego Ave. and Baldorioty De Castro Avenue, in San Juan, Puerto Rico 00907. During the inspection he found that potential ACM material was handled improperly by the ACM removal contractor to the extend that the employees and visitors could have been potentially impacted by breathing asbestos fibers in within the facility and on the outside of the main building. The contractor utilized the service elevator to transfer uncovered ACM stucco and sheet rock from the floors under abatement to bare ground along with other demolition debris on the outside premises. Evidence is visible as stated by the EPA inspector of ACM all over the building exterior as such. potential friable asbestos may be present. The EPA inspector requested the company wet down the ACM to prevent further migration of possible friable materials and to take appropriate measures to protect the employees working in the building. Approximately 2,000 employees work in the complex.

OSC Rodriguez was briefed of the situation later in the afternoon and a determination was taken by CEPD management and personnel to provide for an emergency response assessment by the CERCLA program on the following day to evaluate wether further contamination control actions needed to be in place.

On Wednesday, May 16, 2012, the OSC will conduct a removal action assessment together with the EPA air program personnel. Samples will be taken in strategic locations to evaluate the extend if any of friable ACM migration. The potential exist for closure/evacuation of some of the building's floors as determine by visual observations and the analytical sampling results.

Updates to be provided later on.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2. Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)Good RE: Issue in Puerto Rico

Elena Vaouli Dyken, Jill J. (ATSDR/DCHI/EB) Escobar.Leah 05/21/2012 02:12 PM

We're around, but Leah just went next door to talk to EPA's Removal Section Chief, Joe Rotola. We should be able to call you once she gets back. (Another PR site for you!!)



Fw: Asbestos Containing Material Removal Incident

Charles Nace

Leah Escobar, azd9

This message has been forwarded.

05/21/2012 03:29 PM

Leah.

Please find a briefing for the Centro Minillas Asbestos site in Puerto Rico.

Chuck

---- Forwarded by Charles Nace/R2/USEPA/US on 05/21/2012 03:12 PM -----

From

Ramon Torres/R2/USEPA/US

To.

Judith Enck/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, George Pavlou/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Bonnie

Bellow/R2/USEPA/US@EPA, John LaPadula/R2/USEPA/US@EPA, Lourdes Rodriguez/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, James Daloia/R2/USEPA/US@EPA, Eric Mosher/R2/USEPA/US@EPA, Mary Mears/R2/USEPA/US@EPA, Lisa Plevin/R2/USEPA/US@EPA, Charles Nace/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Beth

Soltani/R2/USEPA/US@EPA

Date:

05/21/2012 12:06 PM

Subject:

Asbestos Containing Material Removal Incident

Briefing

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 00968-8069 Office: 787-977-5820

Cel: 787-671-8368

- Asbestos Containing Material Removal Incident.docx



Centro Minillas Asbestos

Charles Nace Ramon Torres

05/21/2012 04:11 PM

James Daloia, Mark Maddaloni, Angel Rodriguez, Walter Mugdan, Vince Pitruzzello, Michael Moltzen, Leah Escobar, Jill Dyken, Robert Fitzpatrick

This message has been replied to and forwarded.

Ramon.

I wanted to give you an update on our progress with Centro Minillas Asbestos. Mark and I have spoken with ATSDR (Leah Escobar and Jill Dyken) to begin to address technical issues that may arise as the project moves forward. The main issues we discussed were:

- (1) The potential cleanup values that could be used to ensure the building is available for rehabitation . Everyone on the call felt comfortable using the clearance criteria that was used for the Lower Manhattan Apartment Cleaning project, 0.0009 f/cc, which is an asbestos concentration in air. The consensus of the group is that indoor air samples will be needed to evaluate the building. If additional wipe samples are collected, we can employ the experience criteria of 5000 s/cm2 but air samples would still be needed to show that the building could be reopened.
- (2) We also discussed the data that would need to be collected. At this time, we feel that the data collection should focus on collecting indoor air samples from the individual floors. However, since we do not have information on the physical characteristics of the building (square footage, office layout, etc.) we feel that it would be best to consult with the selected contractor as they develop the workplan for moving forward. In this manner, we will be able to provide the technical input needed to ensure that we obtain the data necessary to get the building back on line as soon as possible.

George had relayed through Mark that he would like us to remain focused and in touch with the rest of the group on a daily basis (or more frequently if needed). We also would like to bring in Bob Fitzpatrick (our regional NESHAPS guru) as we want to make sure that our technical recommendations will also satisfy the NESHAPS clearance process also.

Please let us know if you have any questions.

Thanks,

Chuck Nace Environmental Toxicologist

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

212.637.4164 212.637.3083 - fax nace.charles@epa.gov



Re: Centro Minillas Asbestos

Ramon Torres Charles Nace

05/21/2012 05:04 PM

James Daloia, Mark Maddaloni, Angel Rodriguez, Walter Mugdan, Vince Pitruzzello, Michael Moltzen, Leah Escobar, Jill Dyken, Robert

Fitzpatrick, Jose Font, Carlos Rivera

Thanks Chuck.

I am fine with the approach and recommendations. Please add Carlos Rivera and Jose Font in the email chain.

Take care.

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 00968-8069

Office: 787-977-5820 Cel: 787-671-8368

Charles Nace Ramo

Ramon, I wanted to give you an update on our pr...

05/21/2012 04:11:12 PM

From: Charles Nace/R2/USEPA/US
To: Ramon Torres/R2/USEPA/US@EPA

Cc: James Daloia/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Angel

Rodriguez/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, Vince Pitruzzello/R2/USEPA/US@EPA, Michael Moltzen/R2/USEPA/US@EPA, Leah

Escobar/R2/USEPA/US@EPA, Jill Dyken <azd9@cdc.gov>, Robert

Fitzpatrick/R2/USEPA/US@EPA

Date: 05/21/2012 04:11 PM Subject: Centro Minillas Asbestos

Ramon,

I wanted to give you an update on our progress with Centro Minillas Asbestos. Mark and I have spoken with ATSDR (Leah Escobar and Jill Dyken) to begin to address technical issues that may arise as the project moves forward. The main issues we discussed were:

- (1) The potential cleanup values that could be used to ensure the building is available for rehabitation . Everyone on the call felt comfortable using the clearance criteria that was used for the Lower Manhattan Apartment Cleaning project, 0.0009 f/cc, which is an asbestos concentration in air. The consensus of the group is that indoor air samples will be needed to evaluate the building . If additional wipe samples are collected, we can employ the experience criteria of 5000 s/cm2 but air samples would still be needed to show that the building could be reopened.
- (2) We also discussed the data that would need to be collected. At this time, we feel that the data collection should focus on collecting indoor air samples from the individual floors. However, since we do not have information on the physical characteristics of the building (square footage, office layout, etc.) we feel that it would be best to consult with the selected contractor as they develop the workplan for moving forward. In this manner, we will be able to provide the technical input needed to ensure that we obtain the data necessary to get the building back on line as soon as possible.

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regional NESHAPS guru) as we want to make sure that our technical recommendations will also satisfy the NESHAPS clearance process also. Please let us know if you have any questions.

Thanks,

Chuck Nace Environmental Toxicologist

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

212.637.4164 212.637.3083 - fax nace.charles@epa.gov

Asbestos Containing Material Removal Incident Millinas Government Complex- North Tower San Juan, Puerto Rico

Background

On Tuesday, May 15, 2012, personnel from the Air Program in Caribbean Environmental Protection Division (CEPD) conducted an asbestos related inspection under NESHAPS at the Minillas Government Complex located at Jose De Diego Ave. and Baldorioty De Castro Avenue, in San Juan, Puerto Rico 00907. This inspection was in response to a complaint received on May 14, 2012. The complaint indicated that construction workers were handling potential Asbestos Containing Material (ACM) debris in an inappropriate manner, as part of a construction (remodeling) on Floor #9. The 17-store building hosts seven Commonwealth Agencies (approximately 1,000 employees) and it is visited by over hundreds of people daily. During the inspection it was found that potential ACM was handled improperly by a private removal contractor resulting on a potential exposure to employees and visitors inside and outside the building. The contractor used the service elevator to transfer uncovered ACM stucco and sheet rock from the working area (Floor 9) to the lower deck (ground area) floor along with other demolition debris on the outside premises. EPA inspector indicated that the ACM evidence is visible throughout the exterior of the building, in the ground level, Floor #9, elevators and stairways. Potential friable asbestos may be present. The inspector requested the company to wet down the ACM to prevent further migration of possible friable materials and to take appropriate measures to protect the employees working in the building.

After the inspection, the Air Program referred this situation to the Emergency Response Team in CEPD. On Wednesday, May 16, 2012, the OSC Rodriguez conducted a removal action assessment together with the Air Program personnel. A total of 21 biased samples were taken in strategic locations to determine the presence of ACM in other areas throughout the building. See table below.

Matrix	Floor	Location	Abestos Type	*Concentration (structures/cm²)
Bulk	9	Ceiling Hall	(5%) Chrysotile	-
Bulk	9	Ceiling next to exit door	(4%) Chrysotile	
Dust	Ground	Exit Door-Hall- Exterior	(<1%) Chrysotile	-
Dust	Ground	Exterior Collection Area	(<1%) Chrysotile	15
Wipe	Ground	Service Elevator Floor Entrance	Chrysotile	48600
Wipe	Ground	Decorative wall	Chrysotile	<14500
Wipe	Ground	Bookshelf	None Detected	y -
Wipe	7	A/C Reception vent	None Detected	
Wipe	8	A/C Reception vent	None Detected	-
Wipe	8	Elevator Front Frame	None Detected	2.7

Wipe	9	Floor-Collection area	Anthophyllite / Chrysotile	1310000
Wipe	9	Chair by elevator	Anthophyllite / Chrysotile	19400
Wipe	9	Plastic sheet-exit door	Chrysotile	932
Wipe	9	Light fixture	Anthophyllite / Chrysotile	2920000
Wipe	9	A/C vent by Mechanical room	Anthophyllite / Chrysotile	729000
Wipe	10	Elevator Front Frame	None Detected	
Wipe	10	Secretary desk	None Detected	<u> </u>
Wipe	11	Elevator Front Frame	None Detected	Ne.
Wipe	11	Secretary desk	Chrysotile	<5830
Wipe	Elevator No.3	Door Frame right	Anthophyllite / Chrysotile	5850
Wipe	Service Elevator	Floor corner	Chrysotile	31200
Laboratory QC	1 <u>=</u>	-	Chrysotile	<1450

The OSC Rodriguez discussed these results with upper management and Puerto Rico Environmental Quality Board (PREQB) and recommends restricting the access to the building since the concentration of ACM at the main entrance of the building is extremely high. Upper management and PREQB concurred with the recommendation and the Public Building Authority (PBA) was informed over the weekend. PBA is the agency responsible for managing all government buildings. PBA notified all the other head agencies with offices in the building and request to activate their Continuity of Operation Plan to prevent/minimize interruptions of their services. PBA has been extremely cooperative all the time.

Today a meeting between CEPD, CEPD Office of Regional Counsel, PREQB, PBA and PBA's contractors (asbestos removal) was held at CEPD to discuss the action plan to expedite the delineation of the contamination and cleanup of the ACM.

During the meeting several issues were discussed:

- Air Program inspection findings
- Removal Site Assessment findings
- · Interim Action taken
- Request for Information

EPA expressed its interest in expedite the assessment and cleanup of the ACM in order to ensure the protection to human health and the environment. PBA discussed among them (contractors and legal representative) the approach to be use to develop an strategy to address EPA concerns.

PBA stated:

- PAB does not admit any liability nor recognize the any threat to human health associated with the ACM; however as a preventive measure PAB is willing to cooperatively work with EPA to address its recommendations.
- PBA will be meeting this afternoon (May 21) to identify additional technical support (including a certified Industrial Hygienist and asbestos removal professionals) to address all the necessary areas of concerns.
- Maintain restricted access to the building until cleanup is completed and confirmation sampling results indicate it is safe.
- PAB is committed to expedite the sampling and cleanup process, to allow restart operations as soon as possible.
- Work on the sealed areas first. Ground area, elevators and floor 9
- Prepare a cleanup plan and present it to EPA for approval

Media

 Several media press expressed interest in the issues. Statements from PBA and EQB are favorable.

From: Williams-Fleetwood, Sharon O. (ATSDR/DCH1/EB)

Leah Escobar: Dyken, Jill I. (ATSDR/DCHI/EB): Hayes, Lisa (ATSDR/DCHI/EB)

To: Cc:

Elena Vaouli

Subject:

RE: Centro Minillas - ACM site in Puerto Rico

Date:

Tuesday, May 22, 2012 7:30:51 PM

Tina is aware of our current status. Now that we have the request please get it into EHPM (probably P2) and I'm sure you're already on top of that. Also, what type of government complex is this (local govt?)?

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Tuesday, May 22, 2012 9:16 AM

To: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB); Dyken, Jill J. (ATSDR/DCHI/EB); Hayes, Lisa

(ATSDR/DCHI/EB)
Cc: Elena Vaouli

Subject: Centro Minillas - ACM site in Puerto Rico

Hi Sharon

Just wanted to give you an update from yesterday. EPA Risk Assessors, Mark Maddaloni and Chuck Nace requested ATSDR assistance with two issues- determining an appropriate clean up value for reoccupancy of the building and the data that needs to collected. EPA (Nace and Maddaloni) and DCHI staff (Dyken, Graziano and Vaculi) participated in a conference call yesterday on this issue. DCHI advised EPA it can offer technical assistance on this site and will participate in conference calls to move these issues forward. The building remains closed at this time.

We'll put updates in the weekly report.

Thanks Leah

From: Leah Escobar

To: Dyken, Iill I. (ATSDR/DCHI/EB): Elena Vaouli

Subject: Re: Minillas

Date: Tuesday, May 22, 2012 6:28:00 PM

Hi Jill

Thanks again for agreeing to help us out on this.

I plan to review this, but have to admit that my experience with asbestos is very limited. If you don't mind submitting the comments on our behalf to Chuck, I'd appreciate it!

Unless you have suggestion of someone clse from ATSDR that could add value to the team. I would prefer to keep the ATSDR team to just the three of us- you, Elena and me.

Thank you!!!!

Sent by EPA Wireless E-Mail Services

From: "Dyken, Jill J. (ATSDR/DCHI/EB)" [azd9@edc.gov]

Sent: 05/22/2012 08:49 PM GMT To: Leah Escobar; Elena Vaouli

Subject: Minillas

Hi Leah and Elena,

Are you guys planning to review the work plan or do you just want me to co: you on my comments to Chuck?

Also, do you have suggestions on anyone else from ATSDR we should add to the group list? – I'm assuming you two both would like to be on. Let me know!

Jill

PS our Cabo Rojo HC has gotten lost in the Records Room and isn't final yet (I guess they are all out this week). I'm hoping they'll get to it tomorrow – I will be sending out the electronic file as soon as I get it. No worries, I hope! ©

Jill J. Dyken, PhD, PE

Environmental Health Scientist

Agency for Toxic Substances and Disease Registry

Division of Community Health Investigations (proposed)

Eastern Branch (Serving Communities in EPA Regions 1, 2, and 3 – Maine to Virginia)

Mail and Deliveries: 47/0 Buford Highway NE, MST-59, Atlanta, GA 30341-3717

Toll Free: 1-800-CDC-INFO Office Direct: 770-488-0768

Telework (Wed. and alternate Fri); (b) (6)

Tax: 770-488-1547 JDyken@cdc.gov

35

From:

Dyken, Jill J. (ATSDR/DCHI/EB)

To:

Escobar, Leah@epamail.epa.gov; "Vaouli, Elena@epamail.epa.gov" (Vaouli, Elena@epamail.epa.gov)

Subject:

Minillas

Date:

Tuesday, May 22, 2012 4:49:00 PM

Hi Leah and Elena,

Are you guys planning to review the work plan or do you just want me to cc: you on my comments to Chuck?

Also, do you have suggestions on anyone else from ATSDR we should add to the group list? – I'm assuming you two both would like to be on. Let me know!

Jill

PS our Cabo Rojo HC has gotten lost in the Records Room and isn't final yet (I guess they are all out this week). I'm hoping they II get to it tomorrow – I will be sending out the electronic file as soon as I get it. No worries, I hope! ③

Jill J. Dyken, PhD, PE

Environmental Health Scientist

Agency for Toxic Substances and Disease Registry

Division of Community Health Investigations (proposed)
Eastern Branch (Serving Communities in EPA Regions 1, 2, and 3 – Maine to Virginia)

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Toll Free: 1-800-CDC-INFO Office Direct: 770-438-0768

Telework (Wed. and alternate Fri.): (b) (6)

Fax: 770 488 1547 <u>IDyken@cdc.gov</u>

From:

Dyken, Jill J. (ATSDR/DCHI/EB)

To:

Leah Escobar

Subject:

RE: Asbestos Cleanup Response Action Workplan

Date:

Tuesday, May 22, 2012 4:31:00 PM

Got it, thanks!

Jill Dyken

ATSDR Division of Community Health Investigations (proposed) Fastern Branch (Serving Communities in FPA Regions 1, 2, and 3 - Maine to Virginia) 770 488 0768 office (Mon., Tues., and Thurs.)

(b)(6)

telework (Wed. and alternate Fri.)

From: Leah Escobar [mailto:Escobar.Leah@epamail.eoa.gov]

Sent: Tuesday, May 22, 2012 4:25 PM

To: Dyken, Jill J. (ATSDR/DCHI/EB); Elena Vaouli

Subject: Fw: Asbestos Cleanup Response Action Workplan

---- Forwarded by Leah Escobar/R2/USEPA/US on 35/22/2012 04:24 PM -----

Ramon Torres/R2/USEPA/US

Charles Nace/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Leah Escobar/R2/USEPA/US@EPA, Angel

Rodriguez/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA

Robert Fitzpatrick/R2/USEPA/US@EPA

Date: 05/22/2012 04:18 PM

Subject. Asbestos Cleanup Response Action Workplan

Hi Everyone,

Attached please find the action work plan prepared by the Public Building Authority to address the asbestos cleanup. Angel is reviewing it. Please take a look and let me know if you have comments. Due to the severity of this issue, please provide comments by Thursday.

Thanks

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 00968-8069 Office: 787-977-5820 Cel: 787-671-8368

From:

Leah Escobar

Dyken, Jill I. (ATSDR/DCHI/EB): Elena Vaouli Fw: Asbestos Cleanup Response Action Workplan

Subject: Date:

Tuesday, May 22, 2012 4:25:04 PM

Attachments:

Asbestos Cleanup Response Action Work Plan Minillas North Tower.pdf

---- Forwarded by Leah Escobar/R2/USEPA/US on 05/22/2012 04:24 PM -----

Ramon Torres/R2/USEPA/US

Charles Nace/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Leah Escobar/R2/USEPA/US@EPA, Angel

Rodriguez/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA

Robert Fitzpatrick/R2/USEPA/US@EPA

Date

05/22/2012 04:18 PM

Supject. Asbestos Cleanup Response Action Workplan

Hi Everyone,

Attached please find the action work plan prepared by the Public Building Authority to address the asbestos cleanup. Angel is reviewing it. Please take a look and let me know if you have comments. Due to the severity of this issue, please provide comments by Thursday.

Thanks

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 00968-8069 Office: 787-977-5820

Cel: 787-671-8368

From:

Robert Fitzpatrick

To:

Mark Maddaloni

Cc:

Ramon Torres; Leah Escobar; Angel Rodriguez; Dyken, Jill J. (ATSDR/DCHJ/EB); Charles Nace; Elena Vaouli

Subject:

Re: conference call scheduled for this week on Centro Minillas

Date:

Tuesday, May 22, 2012 1:16:15 PM

I'm available to 4:30 PM today!

Fron:

Mark Maddaloni/R2/USEPA/US

To

Ramon Torres/R2/USEPA/US@EPA

Leah Escobar/R2/USEPA/US@EPA, Angel Rodriguez/R2/USEPA/US@EPA, azd9@cdc.gov, Charles

Nace/R2/USEPA/US@EPA, Elena Vaouli/R2/USEPA/US@EPA, Robert Fitzpatrick/R2/USEPA/US@EPA

Date

05/22/2012 12:54 PM

Sup oct.

Re: conference call scheduled for this week on Centro Minillas

4:00 pm works for me, too

TOIT.

Ramon Torres/R2/USEPA/US

To

Leah Escobar/R2/USEPA/US@EPA

Angel Rodriguez/R2/USEPA/US@EPA, azd9@cdc.gov, Charles Nace/R2/USEPA/US@EPA, Elena Vaoul/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Robert Fitzpatrick/R2/USEPA/US@EPA

Date.

Suc oct.

Re: conference call scheduled for this week on Centro Minillas

Thanks Leah,

4:00 PM works for me (all week).

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 00968-8069

Office: 787-977-5820 Cel: 787-671-8368

Leah Escobar/R2/USEPA/US

Charles Nace/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Robert Fitzpatrick/R2/USEPA/US@EPA, Angel Rodriguez/R2/USEPA/US@EPA, azd9@cdc gov, Ramon Torres/R2/USEPA/US@EPA

Elena Vaouli/R2/USEPA/US@EPA

Date 05/22/2012 11:12 AM

Subject conference call scheduled for this week on Centro Minillas

I've heard from Jill and Mark with their availability today and it seems that 4:00pm is going to work best for their schedules and mine to hold the call.

Bob. Chuck, Ramon and Angel, please send your availability for 4:00pm today and please send your availability for the remainder of the week. I will not be facilitating the call for the group on Friday, as I will be on annual leave and out of town. Jill Dyken is unavailable Friday as well and I believe that Chuck is out of the office. The remaining group can hold a call, if necessary, but you will need to utilize another bridgeline.

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Also, below is Mark's earlier email with several points we should consider for today's call: It would probably be helpful (and responsive to our upper management) to schedule a daily briefing while this event is still unfolding. Appreciate that not all will be able to participate. My own schedule is quite busy today. I'm available between 12 - 1pm and then after 4 pm (otherwise 9am works good for me the rest of the week). I spoke with Bob Fitzpatrick this morning and he'll gladly assist us with any NESHAPS and related asbestos issues. To build on the briefing email (below) that Chuck sent yesterday, I wanted to add a few more things for the workgroup to consider and contemplate. For the WTC Test and Clean Program, we employed a two tiered Action Level/Remediation Goal for asbestos in settled dust: 5,000 f/cm2 for accessible areas and 50,000 f/cm2 for infrequently accessed areas (I'll distribute the report that details the basis for these numbers). We already appear to be in agreement about the value for accessible areas, but we might want to consider a secondary benchmark for areas that act as dust reservoirs. Another issue is: would there be value added by obtaining "background" indoor air/settled dust sampling? Finally, on a less contentious note, our WTC team had protocols for "Clearing" floors of the Deutche Bank before demolition was performed to minimize any asbestos emissions. The air sampling strategy for clearing the large surface area floors might prove insightful for Centro Minillas although it's certainly appreciated that the sites are different in many ways. (I'll distribute that report as well).

For the EPA group, I am not including your senior management in these technical calls, as I understand that this is the core group expected to deal with the rehabitation and data needs. If I've left someone off this email or senior management need to be included in these conference calls, provide their names and I will include them in the meeting invite.

I volunteered to assist the group with this task, so please work cooperatively with me to accomplish the scheduling of these calls. Otherwise, I will leave this task to someone from EPA.

Thank you, Leah

From:

Mark Maddaloni

To:

Ramon Torres

Cc:

Leah Escobar; Angel Rodriguez; Dyken, Iill I. (ATSDR/DCHI/EB); Charles Nace; Elena Vaouli; Robert Fitzpatrick

Subject:

Re: conference call scheduled for this week on Centro Minillas

Date:

Tuesday, May 22, 2012 12:54:23 PM

4:00 pm works for me, too

Fron*

Ramon Torres/R2/USEPA/US

Leah Escobar/R2/USEPA/US@EPA

Angel Rodriguez/R2/USEPA/US@EPA, azd9@cdc.gov, Charles Nace/R2/USEPA/US@EPA, Elena Vaouli/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Robert Fitzpatrick/R2/USEPA/US@EPA

Dale

05/22/2012 12:02 PM

Subject.

Re: conference call scheduled for this week on Centro Minillas

Thanks Leah,

4:00 PM works for me (all week).

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 00968-8069

Office: 787-977-5820 Cel: 787-671-8368

Fron:

Leah Escobar/R2/USEPA/US

Charles Nace/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Robert Fitzpatrick/R2/USEPA/US@EPA, Angel

Rodriguez/R2/USEPA/US@EPA, azd9@cdc.gov, Ramon Torres/R2/USEPA/US@EPA

Elena Vaouli/R2/USEPA/US@EPA

Date:

05/22/2012 11:12 AM

Subject:

conference call scheduled for this week on Centro Minillas

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Thank you, Leah

Dyken, Jill J. (ATSDR/DCHI/EB)

From:

Sent:

Dyken, Jill J. (ATSDR/DCHI/EB) Tuesday, May 22, 2012 12:33 PM Leah Escobar/R2/USEPA/US

To:

Subject:

Accepted: Invitation: Centro Minillas conference call (May 23 09:00 AM EDT)

Dyken, Jill J. (ATSDR/DCHI/EB)

From:

Sent: To:

Subject:

Dyken, Jill J. (ATSDR/DCHI/EB) Tuesday, May 22, 2012 12:33 PM Leah Escobar/R2/USEPA/US Accepted: Invitation: Centro Minillas conference call (May 22 04:00 PM EDT)

From:

Ramon Torres

To:

Leah Escobar

Cc:

Angel Rodriguez: Dyken, Jill J. (ATSDR/DCHI/EB): Charles Nace: Elena Vaouli: Mark Maddaloni: Robert Fitzpatrick

Subject:

Re: conference call scheduled for this week on Centro Minillas

Date:

Tuesday, May 22, 2012 12:02:06 PM

Thanks Leah,

4:00 PM works for me (all week).

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guavnabo, PR 00968-8069 Office: 787-977-5820

Cel: 787-671-8368

Leah Escobar/R2/USEPA/US

To.

Charles Nace/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Robert Fitzpatrick/R2/USEPA/US@EPA. Angel

Rodriguez/R2/USEPA/US@EPA, azd9@cdc.gov, Ramon Torres/R2/USEPA/US@EPA

Elena Vaouli/R2/USEPA/US@EPA 130

Date: 05/22/2012 11:12 AM

Sugject conference call scheduled for this week on Centro Minillas

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Thank you, Leah

From: <u>Leah Escobar</u>

To: Charles Nace: Mark Maddaloni; Robert Fitzpatrick; Angel Rodriguez; Dyken, Iill I, (ATSDR/DCHI/EB); Ramon

Torres

Cc: Elena Vaouli

Subject: conference call scheduled for this week on Centro Minillas

Date: Tuesday, May 22, 2012 11:12:06 AM

Importance: High

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I volunteered to assist the group with this task, so please work cooperatively with me to accomplish the scheduling of these calls. Otherwise, I will leave this task to someone from EPA.

Thank you, Leah

From: Angel Rodriguez To: Mark Maddaloni

Cc: Leah Escobar; Charles Nace; Dyken, Jill J. (ATSDR/DCHI/EB); Elena Vaouli; Robert Fitzpatrick; Ramon Torres;

Vince Pitruzzello; Michael Moltzen; Dennis Santella; Pat Evangelista; George Pavlou

Subject: Re: Centro Minillas Asbestos Date: Tuesday, May 22, 2012 10:54:28 AM

Good idea...

Please coordinate with Ramon Torres.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)

Fron: Mark Maddaloni/R2/USEPA/US

Leah Escobar/R2/USEPA/US@EPA, Charles Nace/R2/USEPA/US@EPA, azd9@cdc.gov, Elena Vaouli:R2/USEPA/US@EPA, Robert Fitzpatrick/R2/USEPA/US@EPA, Angel Rodriguez/R2/USEPA/US@EPA

Ramon Torres/R2/USEPA/US@EPA, Vince Pitruzzello/R2/USEPA/US@EPA, Michael Moltzen/R2/USEPA/US@EPA, Dennis Santella/R2/USEPA/US@EPA, Pat Evangelista/R2/USEPA/US@EPA, George Pavlou/R2/USEPA/US@EPA

05/22/2012 10:41 AM

Subject: Re: Centro Minillas Asbestos

Hi Leah.

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Regards

From: Leah Escobar/R2/USEPA/US

Charles Nace/R2/USEPA/US@EPA, azd9@cdc.gov, Mark Maddaloni/R2/USEPA/US@EPA, Elena Vaouli/R2/USEPA/US@EPA

Dale: 05/22/2012 09:18 AM

Subject Re: Centro Minillas Asbestos

Do you want me to schedule another conference call with the group today? If so, send me your availability for today and the rest of the week, and I will get the meeting notices sent out.

Mark, did you have a chance to speak with Bob Fitzpatrick?

Thanks

From Charles Nace/R2/USEPA/US

To. Ramon Torres/R2/USEPA/US@EPA

Usepa/Usepa/Usepa/Usepa/Usepa/Usepa, Mark Maddaloni/R2/Usepa/Us@epa, Angel Rodriguez/R2/Usepa/Us@epa, Walter Mugdan/R2/Usepa/Usepa, Vince Pitruzzello/R2/Usepa/Usepa, Michael Moltzen/R2/Usepa/Usepa, Leah

Escobar/R2/USEPA/US@EPA, Jill Dyken <azd9@cdc.gov>, Robert Fitzpatrick/R2/USEPA/US@EPA

Date: 05/21/2012 04:11 PM
Subject: Centro Minillas Asbestos

Ramon,

I wanted to give you an update on our progress with Centro Minillas Asbestos. Mark and I have spoken with ATSDR (Leah Escobar and Jill Dyken) to begin to address technical issues that may arise as the project moves forward. The main issues we discussed were:

(1) The potential cleanup values that could be used to ensure the building is available for rehabitation. Everyone on the call felt comfortable using the clearance criteria that was used for the Lower Manhattan Apartment Cleaning project, 0.0009 f/cc, which is an asbestos concentration in air. The consensus of the group is that indoor air samples will be needed to evaluate the building. If additional wipe samples are collected, we can employ the experience criteria of 5000 s/cm2 but air samples would still be needed to

show that the building could be reopened.

(2) We also discussed the data that would need to be collected. At this time, we feel that the data collection should focus on collecting indoor air samples from the individual floors. However, since we do not have information on the physical characteristics of the building (square footage, office layout, etc.) we feel that it would be best to consult with the selected contractor as they develop the workplan for moving forward. In this manner, we will be able to provide the technical input needed to ensure that we obtain the data necessary to get the building back on line as soon as possible.

George had relayed through Mark that he would like us to remain focused and in touch with the rest of the group on a daily basis (or more frequently if needed). We also would like to bring in Bob Fitzpatrick (our regional NESHAPS guru) as we want to make sure that our technical recommendations will also satisfy the NESHAPS clearance process also.

Please let us know if you have any questions.

Thanks.

Chuck Nace Environmental Toxicologist

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

From:

Dyken, Jill J. (ATSDR/DCHI/EB)

To:

Leah Escobar

Subject:

RE: Centro Minillas Asbestos

Date:

Tuesday, May 22, 2012 10:43:00 AM

Not surprising − it seems these guys communicate about the same as the Cabo Rojo folks did! ◎ Thanks for doing such a thorough and professional job involving us.

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Tuesday, May 22, 2012 10:41 AM To: Dyken, Jill J. (ATSDR/DCHI/EB) Subject: RE: Centro Minillas Asbestos

Thanks Jill

I still have not head from Mark or Chuck yet

From

"Dyken, Jill J. (ATSDR/DCHI/EB)" <azd9@cdc.gov>

To

Leah Escobar/R2/USEPA/US@EPA

Date 05/22/2012 10:35 AM

Sugject: RE: Centro Minillas Asbestos

I'm in today until 5 – and Wed, and Thurs, from 7:30 to 5. Pretty flexible though I think I have lunch plans Thurs,

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Tuesday, May 22, 2012 9:18 AM

To: Charles Nace; Dyken, Jill J. (ATSDR/DCHI/EB); Mark Maddaloni; Elena Vaouli

Subject: Re: Centro Minillas Asbestos

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From

Charles Nace/R2/USEPA/US

Tc:

Ramon Torres/R2/USEPA/US@EPA

James Daloia/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Angel Rodriguez/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, Vince Pitruzzello/R2/USEPA/US@EPA, Michael Moltzen/R2/USEPA/US@EPA, Leah

Escobar/R2/USEPA/US@EPA, Jill Dyken azd9@cdc.gov, Robert Fitzpatrick/R2/USEPA/US@EPA

Date: 05/21/2012 04:11 PM Sup oct. Centro Minillas Asbestos Ramon,

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Chuck Nace Environmental Toxicologist

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

From: Mark Maddaloni

To: Leah Escobar: Charles Nace: Dyken, Idl I, (ATSDR/DCHI/EB); Elena Vaouli; Robert Fitzpatrick: Angel Rodriguez

Cc: Ramon Torres: Vince Pitruzzello: Michael Moltzen: Dennis Santella: Pat Evangelista: George Pavlou

Subject: Re: Centro Minillas Asbestos
Date: Tuesday, May 22, 2012 10:42:51 AM

Hi Leah,

It would probably be helpful (and responsive to our upper management) to schedule a daily briefing while this event is still unfolding. Appreciate that not all will be able to participate. My own schedule is quite busy today. I'm available between 12 - 1pm and then after 4 pm (otherwise 9am works good for me the rest of the week). I spoke with Bob Fitzpatrick this morning and he'll gladly assist us with any NESHAPS and related asbestos issues. To build on the briefing email (below) that Chuck sent yesterday, I wanted to add a few more things for the workgroup to consider and contemplate. For the WTC Test and Clean Program, we employed a two tiered Action Level/Remediation Goal for asbestos in settled dust: 5,000 f/cm2 for accessible areas and 50,000 f/cm2 for infrequently accessed areas (I'll distribute the report that details the basis for these numbers). We already appear to be in agreement about the value for accessible areas, but we might want to consider a secondary benchmark for areas that act as dust reservoirs. Another issue is: would there be value added by obtaining "background" indoor air/settled dust sampling? Finally, on a less contentious note, our WTC team had protocols for "Clearing" floors of the Deutche Bank before demolition was performed to minimize any asbestos emissions. The air sampling strategy for clearing the large surface area floors might prove insightful for Centro Minillas although it's certainly appreciated that the sites are different in many ways. (I'll distribute that report as well).

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From Leah Escobar/R2/USEPA/US

To: Charles Nace/R2/USEPA/US@EPA, azd9@cdc.gov_Mark_Maddaloni/R2/USEPA/US@EPA, Elena Vaouli/R2/USEPA/US@EPA

Date: 05/22/2012 09:18 AM

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Escobar/R2/USEPA/US@EPA, Jill Dyken <azd9@cdc.gov>, Robert Fitzpatrick/R2/USEPA/US@EPA

Date: 05/21/2012 04:11 PM
Succeed: Centro Minillas Asbestos

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USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

From:

Leah Escobar

To: Subject:

Dyken, III I. (ATSDR/DCHI/EB) RE: Centro Minillas Asbestos

Date:

Tuesday, May 22, 2012 10:41:29 AM

Thanks Jill

I still have not head from Mark or Chuck yet

From

"Dyken, Jill J. (ATSDR/DCHI/EB)" <azd9@cdc.gov>

To.

Leah Escobar/R2/USEPA/US@EPA

Cale:

05/22/2012 10:35 AM

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From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Tuesday, May 22, 2012 9:18 AM

To: Charles Nace; Dyken, Jill J. (ATSDR/DCHI/EB); Mark Maddaloni; Elena Vaouli

Subject: Re: Centro Minillas Asbestos

Do you want me to schedule another conference call with the group today? If so, send me your availability for today and the rest of the week, and I will get the meeting notices sent out.

Mark, did you have a chance to speak with Bob Fitzpatrick?

Thanks

Fron:

Charles Nace/R2/USEPA/US

Ramon Torres/R2/USEPA/US@EPA

James Daloia/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Angel Rodriguez/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, Vince Pitruzzello/R2/USEPA/US@EPA, Michael Moltzen/R2/USEPA/US@EPA, Leah

Escobar/R2/USEPA/US@EPA, Jill Dyken scobar/R2/USEPA/US@EPA/US#U

Date

05/21/2012 04:11 PM

Subject

Centro Minillas Asbestos

Ramon.

I wanted to give you an update on our progress with Centro Minillas Asbestos. Mark and I have spoken with ATSDR (Leah Escobar and Jill Dyken) to begin to address technical issues that may arise as the project moves forward. The main issues we discussed were:

(1) The potential cleanup values that could be used to ensure the building is available for rehabitation. Everyone on the call felt comfortable using the clearance criteria that was used for the Lower Manhattan

Apartment Cleaning project, 0.0009 f/cc, which is an asbestos concentration in air. The consensus of the group is that indoor air samples will be needed to evaluate the building. If additional wipe samples are collected, we can employ the experience criteria of 5000 s/cm2 but air samples would still be needed to show that the building could be reopened.

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George had relayed through Mark that he would like us to remain focused and in touch with the rest of the group on a daily basis (or more frequently if needed). We also would like to bring in Bob Fitzpatrick (our regional NESHAPS guru) as we want to make sure that our technical recommendations will also satisfy the NESHAPS clearance process also.

Please let us know if you have any questions.

Thanks.

Chuck Nace Environmental Toxicologist

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

From:

Leah Escobar

To:

Angel Rodriguez

Cc:

James Daloia; Carlos Rivera: Jose Font; Charles Nace; Mark Maddaloni

Subject:

Re: Conversations with ATSDR Leah Escobar

Date:

Tuesday, May 22, 2012 10:38:49 AM

Angel

As Jim indicated in his email, I spoke with PR DOH, Dra. Brenda Rivera, Chief of the Field Epidemiology Program, as Dr. Johnny Rullan, the State Epidemiologist and Dra. Rivera's boss is out of the office until Thursday. I did not send them any of the information you provided in your emails, including the data. I left you a voicemail message on your desk phone and I sent an email about this. If you could please tell me the names of the staff at PR DOH that you have been working with, I'd appreciate that. I can work to ensure that Dra Rivera and Dr Rullan speak with their colleagues at DOH on this matter.

I spoke with Chuck Nace and Mark Maddaloni yesterday afternoon, and they requested ATSDR to provide technical assistance and work with them. Bob Fitzpatrick and you to determine the appropriate clean up values for rehabitation of the building and to determine what data needs to be collected. ATSDR will work with the EPA group to provide the appropriate technical assistance on these issues. The ATSDR team consists of Jill Dyken, Elena Vaouli and myself.

Feel free to contact me with any questions.

Thank you Leah

From

Angel Rodriguez/R2/USEPA/US

To

James Daloia/R2/USEPA/US@EPA

Carlos Rivera/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, Leah Escobar/R2/USEPA/US@EPA

Date:

05/22/2012 10:14 AM

Sucject.

Re: Conversations with ATSDR Leah Escobar

Good morning...Jim

I sent Leah the data on Sunday, May 20, 2012. So ATSDR now have it for a while. I also asked her to talk to the PRDOH rep. Leah stated she would contact Dr. Brenda Rivera and Dr. Rullan(not sure how to write it).

Hopefully she did. PRDOH is talking nonsense at this time.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch,

Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)

From James Daloia/R2/USEPA/US

To: Angel Rodriguez/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA

Jose Font/R2/USEPA/US@EPA

Date: 05/21/2012 03:35 PM

Suc oct. Conversations with ATSDR Leah Escobar

Gentlemen: Based on George Pavlou's comments and suggestion, he indicated that he would like the ATSDR to engage on this response action.

"Angel, have you had the data reviewed by our risk assessors, ATSDR, and PRDOH before contacting building management".

If they are needed Leah would like to know how she can help and that would be translated into what questions or concerns you have that ATSDR maybe able to help you with. I know she had already spoke to PRDOH. The same person that Angel is familiar with on Aricebo Battery.

If there is nothing for them to do, please call her and let her know, or you can tell her to stand down for now until we come up with more definitive information.

I did not want to speak for you guys as you are involved with the PRP and the DOH etc.

From: Dyken, Jill J. (ATSDR/DCHI/EB)

To: Leah Escobar

Subject: RE: Centro Minillas Asbestos
Date: Tuesday, May 22, 2012 10:35:00 AM

I'm in today until 5 – and Wed. and Thurs. from 7:30 to 5. Pretty flexible though I think I have lunch plans Thurs.

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Tuesday, May 22, 2012 9:18 AM

To: Charles Nace; Dyken, Jill J. (ATSDR/DCHI/EB); Mark Maddaloni; Elena Vaouli

Subject: Re: Centro Minillas Asbestos

Do you want me to schedule another conference call with the group today? If so, send me your availability for today and the rest of the week, and I will get the meeting notices sent out.

Mark, did you have a chance to speak with Bob Fitzpatrick?

Thanks

From Charles Nace/R2/USEPA/US

To. Ramon Torres/R2/USEPA/US@EPA

James Daloia/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Angel Rodriguez/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, Vince Pitruzzello/R2/USEPA/US@EPA, Michael Moltzen/R2/USEPA/US@EPA, Leah

Escobar/R2/USEPA/US@EPA, Jill Dyken <a href="mailto:sepa-use

Date: 05/21/2012 04:11 PM Subject: Centro Minillas Asbestos

Ramon,

I wanted to give you an update on our progress with Centro Minillas Asbestos. Mark and I have spoken with ATSDR (Leah Escobar and Jill Dyken) to begin to address technical issues that may arise as the project moves forward. The main issues we discussed were:

- (1) The potential cleanup values that could be used to ensure the building is available for rehabitation. Everyone on the call felt comfortable using the clearance criteria that was used for the Lower Manhattan Apartment Cleaning project, 0.0009 f/cc, which is an asbestos concentration in air. The consensus of the group is that indoor air samples will be needed to evaluate the building. If additional wipe samples are collected, we can employ the experience criteria of 5000 s/cm2 but air samples would still be needed to show that the building could be reopened.
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regional NESHAPS guru) as we want to make sure that our technical recommendations will also satisfy the NESHAPS clearance process also.

Please let us know if you have any questions.

Thanks,

Chuck Nace Environmental Toxicologist

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

From:

Williams-Fleetwood, Sharon O. (ATSDR/DCH1/EB)

To:

"Escobar Leah@epamail.epa.gov"; Dyken, Till T. (ATSDR/DCHI/EB); Hayes, Lisa (ATSDR/DCHI/EB)

Cc:

"Vaouli Elena@epamail.epa.gov"

Subject:

Re: Centro Minillas - ACM site in Puerto Rico

Date:

Tuesday, May 22, 2012 9:50:50 AM

Sounds good. Thanks and keep me posted.

Sharon

Sharon O. Williams-Fleetwood, Ph.D. CAPT US Public Health Service Chief Scientist Officer

Division of Community Health Investigations (proposed) Agency for Toxic Substances and Disease Registry 770-488-0743

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Tuesday, May 22, 2012 09:15 AM

To: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB); Dyken, Jill J. (ATSDR/DCHI/EB); Hayes, Lisa

(ATSDR/DCHI/EB)

Cc: Elena Vaouli < Vaouli. Elena@epamail.epa.gov> Subject: Centro Minillas - ACM site in Puerto Rico

Hi Sharon

Just wanted to give you an update from yesterday. EPA Risk Assessors, Mark Maddaloni and Chuck Nace requested ATSDR assistance with two issues- determining an appropriate clean up value for reoccupancy of the building and the data that needs to collected. EPA (Nace and Maddaloni) and DCHI staff (Dyken, Graziano and Vaculi) participated in a conference call yesterday on this issue. DCHI advised EPA it can offer technical assistance on this site and will participate in conference calls to move these issues forward. The building remains closed at this time.

We'll put updates in the weekly report.

Thanks Leah

From:

Leah Escobar

To:

Charles Nace: Dyken, Jill I. (ATSDR/DCHI/EB); Mark Maddaloni; Elena Vaouli

Subject: Date:

Re: Centro Minillas Asbestos Tuesday, May 22, 2012 9:18:48 AM

Do you want me to schedule another conference call with the group today? If so, send me your availability for today and the rest of the week, and I will get the meeting notices sent out.

Mark, did you have a chance to speak with Bob Fitzpatrick?

Thanks

Charles Nace/R2/USEPA/US

Ramon Torres/R2/USEPA/US@EPA

James Daloia/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Angel Rodriguez/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, Vince Pitruzzello/R2/USEPA/US@EPA, Michael Moltzen/R2/USEPA/US@EPA, Leah

Escobar/R2/USEPA/US@EPA, Jill Dyken <azd9@cdc.gov>, Robert Fitzpatrick/R2/USEPA/US@EPA

05/21/2012 04:11 PM

Supect

Centro Minillas Asbestos

Ramon.

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Please let us know if you have any questions.

Thanks.

Chuck Nace

Environmental Toxicologist

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

From:

Leah Escobar

To:

Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB); Dyken, Iill I. (ATSDR/DCHI/EB); Hayes, Lisa

(ATSDR/DCHI/EB)

Cc:

Elena Vaouli

Subject: Date: Centro Minillas - ACM site in Puerto Rico Tuesday, May 22, 2012 9:16:01 AM

Hi Sharon

Just wanted to give you an update from yesterday. EPA Risk Assessors, Mark Maddaloni and Chuck Nace requested ATSDR assistance with two issues- determining an appropriate clean up value for reoccupancy of the building and the data that needs to collected. EPA (Nace and Maddaloni) and DCHI staff (Dyken, Graziano and Vaculi) participated in a conference call yesterday on this issue. DCHI advised EPA it can offer technical assistance on this site and will participate in conference calls to move these issues forward. The building remains closed at this time.

We'll put updates in the weekly report.

Thanks

Leah

From:

Ramon Torres

To:

Charles Nace

James Daloia: Mark Maddaloni; Angel Rodriguez; Walter Mugdan; Vince Pitruzzello; Michael Moltzen; Leah

Escobar; Dyken, Jill J. (ATSDR/DCHI/EB); Robert Fitzpatrick; Jose Font; Carlos Rivera

Subject:

Re: Centro Minillas Asbestos

Date:

Monday, May 21, 2012 5:04:45 PM

Thanks Chuck,

I am fine with the approach and recommendations. Please add Carlos Rivera and Jose Font in the email chain.

Take care,

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 00968-8069 Office: 787-977-5820

Cel: 787-671-8368

Charles Nace---05/21/2012 04:11:12 PM---Ramon, I wanted to give you an update on our progress with Centro Minillas Asbestos. Mark and I have

From Charles Nace/R2/USEPA/US

10 Ramon Torres/R2/USEPA/US@EPA

Co James Daloia/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Angel Rodriguez/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, Vince Pitruzzello/R2/USEPA/US@EPA, Michael Moltzen/R2/USEPA/US@EPA, Leah

Escobar/R2/USEPA/US@EPA, Jill Dyken <azd9@cdc.gov>, Robert Fitzpatrick/R2/USEPA/US@EPA

Data 05/21/2012 04:11 PM Surgect Centro Minillas Asbestos

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Thanks,

Chuck Nace Environmental Toxicologist

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

From:

Charles Nace

To:

Ramon Torres

Cc:

James Daloia; Mark Maddaloni; Angel Rodriguez; Walter Mugdan; Vince Pitruzzello; Michael Moltzen; Leah

Escobar; Dyken, Jill J. (ATSDR/DCHI/EB); Robert Fitzpatrick

Subject:

Centro Minillas Asbestos

Date:

Monday, May 21, 2012 4:11:14 PM

Ramon,

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Chuck Nace Environmental Toxicologist

USEPA - Region 2 290 Broadway - 18th Floor New York, NY 10007-1866

From:

Charles Nace

To:

Leah Escobar: Dyken, Idl I. (ATSDR/DCHI/EB)
Fw: Asbestos Containing Material Removal Incident

Subject: Date:

Monday, May 21, 2012 3:29:03 PM

Attachments:

Asbestos Containing Material Removal Incident.docx

Leah.

Please find a briefing for the Centro Minillas Asbestos site in Puerto Rico.

Chuck

---- Forwarded by Charles Nace/R2/USEPA/US on 05/21/2012 03.12 PM ----

From

Ramon Torres/R2/USEPA/US

Judith Enck/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, George Pavlou/R2/USEPA/US@EPA. Carlos Rivera/R2/USEPA/US@EPA, Bonnie Bellow/R2/USEPA/US@EPA, John LaPadula/R2/USEPA/US@EPA, Lourdes Rodriguez/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, James Daloia/R2/USEPA/US@EPA, Eric Mosher/R2/USEPA/US@EPA, Mary Mears/R2/USEPA/US@EPA, Lisa Plevin/R2/USEPA/US@EPA, Charles

Nace/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Beth Soltani/R2/USEPA/US@EPA

Date:

05/21/2012 12:06 PM

Subject:

Asbestos Containing Material Removal Incident

Briefing

Ramon Torres, Acting Chief Response and Remediation Branch Caribbean Environmental Protection Division City View Plaza II - Suite 7000 Guaynabo, PR 00968-8069 Office: 787-977-5820

Office: 787-977-5820 Cel: 787-671-8368

From:

Leah Escobar

To:

Dyken, Iill I. (ATSDR/DCHI/EB)

Subject:

Fw: Minillas Asbestos Release and Evacuation Update

Date:

Monday, May 21, 2012 3:24:35 PM

---- Forwarded by Leah Escobar/R2/USEPA/US on 05/21/2012 03:20 PM -----

Angel Rodriguez/R2/USEPA/US

James Daloia/R2/USEPA/US@EPA, Eric Mosher/R2/USEPA/US@EPA, Mark Maddaloni/R2/USEPA/US@EPA, Lourdes Rodriguez/R2/USEPA/US@EPA, Teresita Rodriguez/R2/USEPA/US@EPA, Leah Escobar/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, Ramon Torres/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA, George

Pavlou/R2/USEPA/US@EPA

Date

05/20/2012 06:47 PM

Sugget: Minillas Asbestos Release and Evacuation Update

Good afternoon...Folks

On May 20, 2012, at approximately 1430 hours, OSC Rodriguez requested the Public Buildings Authority (AEP) take the immediate necessary steps to prevent the access to employees and visitors to the North Tower on the Minillas Commonwealth Government Complex.

It is expected that no employee/access will be granted to the AEP management and that evacuation will remain in effect until the facility provides a Work Plan, a Health and Safety Plan and a Sampling plan that must address proper protocols to control contamination migrating from the 9th floor, the appropriate decoming of the impacted other floors and the pertinent clearance sampling as approved by EPA.

On May 21, 2012, a meeting is scheduled with the PRP(AEP) at 0800 hours to discuss the next steps.

Once the cross contamination is addressed and certain necessary actions are taken, CERCLA will deferred the enforcement action to the EPA Air program.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.)

rodriguez.angel@epa.gov (e-mail)

From: Leah Escobar

To: Dyken, III I. (ATSDR/DCHI/EB)

Cc: Elena Vaouli; Hayes, Lisa (ATSDR/DCHI/EB); Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Subject: RE: Issue in Puerto Rico

Date: Monday, May 21, 2012 2:50:29 PM

Hi Jill

Yes both of us are here this afternoon and yes both Chuck and Mark are involved with this evaluation. I understand that they will be using the WTC study to guide them in the re-occupancy.

I still do not have any question and am still waiting to hear from the OSC about what they want us to do.

Thanks

From: "Dyken, Jill J. (ATSDR/DCHI/EB)" <azd9@cdc.gov>

1e Leah Escobar/R2/USEPA/US@EPA

"Hayes, Lisa (ATSDR/DCHI/EB)" lih1@cdc.gov>, "Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)" <sow1@cdc.gov>,

Elena Vaouli/R2/USEPA/US@EPA

Dato: 05/21/2012 02:10 PM

Support: RE: Issue in Puerto Rico

Hi Leah, are you and/or Elena available to discuss this afternoon? I'd be happy to help out in any way needed. EPA R2 also has Mark Maddaloni and Chuck Nace, TRW Asbestos Committee members who were very active in the WTC studies – I'd want to make sure they were involved and our response was coordinated with them. Thanks,

Jill

Jill Dyken

ATSDR Division of Community Health Investigations (proposed)
Eastern Branch (Serving Communities in EPA Regions 1, 2, and 3 – Maine to Virginia)
770-488-0768 office (Mon., Tues., and Thurs.)
404-321-9030 telework (Wed. and alternate Fri.)

From: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Sent: Monday, May 21, 2012 2:02 PM To: Dyken, Jill J. (ATSDR/DCHI/EB) Cc: Hayes, Lisa (ATSDR/DCHI/EB) Subject: FW: Issue in Puerto Rico

Importance: High

Per our conversation.

From: Leah Escobar [mailto:Escobar,Leah@epamail.epa.gov]

Sent: Monday, May 21, 2012 10:32 AM

To: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Cc: Uveges, Pam S. (ATSDR/DCHI/EB) (CTR)

Subject: Issue in Puerto Rico

Importance: High

Hi Sharon,

Below I've copied and pasted an email on a building in San Juan, PR that EPA has found is contaminated with asbestos. EPA has asked for ATSDR to review the data and discuss potential health implications. I have data I can provide in another email. I was not made aware of this situation until yesterday evening, when the OSC called me at 6:00pm and advised me of the situation. The OSC, Angel Rodriguez, had apparently been advised by his senior management (Division Director and Deputy Regional Administrator- George Pavlou) that ATSDR needs to be made aware of the situation and be part of the assessment. I've also been asked to make PR DOH aware of the situation.

We need to discuss, as there is going to be a need for quick turn around, as the building is currently closed, and EPA and EQB are suggesting to the building owners that it not be re-occupied until the data can be assessed.

Thank you, Leah

To: R2 RRC@epa.gov

From: Angel Rodriguez/R2/USEPA/US

Date: 05/16/2012 09:59AM

Cc: Adalberto Bosque/R2/USEPA/US@EPA, Ramon Torres/R2/USEPA/US@EPA, Jose

Font/R2/USEPA/US@EPA, "James" < daloia.james@epa.gov >, Eric Mosher/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA,

Jose Soto/R2/USEPA/US@EPA, Teresita Rodriguez/R2/USEPA/US@EPA

Subject: Minillas Government Complex Asbestos Response Site, located at Jose De Diego Ave. and

Baldorioty De Castro Avenue, San Juan, Puerto Rico 00907

Good morning...Folks

On Tuesday, May 15, 2012, the EPA air program in CEPD conducted an asbestos related inspection under NESHAPS at the Minillas Government Complex located at Jose De Diego Ave. and Baldorioty De Castro Avenue, in San Juan, Puerto Rico 00907. During the inspection he found that potential ACM material was handled improperly by the ACM removal contractor to the extend that the employees and visitors could have been potentially impacted by breathing asbestos fibers in within the facility and on the outside of the main building. The contractor utilized the service elevator to transfer uncovered ACM stucco and sheet rock from the floors under abatement to bare ground along with other demolition debris on the outside premises. Evidence is visible as stated by the EPA inspector of ACM all over the building exterior as such, potential friable asbestos may be present. The EPA inspector requested the company wet down the ACM to prevent further migration of possible friable materials and to take appropriate measures to protect the employees working in the building. Approximately 2,000 employees work in the complex.

OSC Rodriguez was briefed of the situation later in the afternoon and a determination was taken by CEPD management and personnel to provide for an emergency response assessment by the CERCLA program on the following day to evaluate wether further contamination control actions needed to be in place.

On Wednesday, May 16, 2012, the OSC will conduct a removal action assessment together with the EPA air program personnel. Samples will be taken in strategic locations to evaluate the extend if any of friable ACM migration. The potential exist for closure/evacuation of some of the building's floors as determine by visual observations and the analytical sampling results.

Updates to be provided later on.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

City View Plaza Tower 2, Suite 7000 48 State Rd. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.) (787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)Good

From:

Elena Vaouli

To: Cc: Dyken, Iill I. (ATSDR/DCHI/EB) Escobar Leah@epamail.epa.gov

Subject:

RE: Issue in Puerto Rico

Date:

Monday, May 21, 2012 2:12:44 PM

We're around, but Leah just went next door to talk to EPA's Removal Section Chief, Joe Rotola. We should be able to call you once she gets back. (Another PR site for you!!)

From: Dyken, Jill J. (ATSDR/DCHI/EB)
To: Escobar, Leah@epamail.epa.gov

Cc: Hayes, Lisa (ATSDR/DCHI/EB); Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB);

"Vaouli, Elena@epamail.epa.gov" (Vaou i, Elena@epamail.epa.gov)

Subject: RE: Issue in Puerto Rico

Date: Monday, May 21, 2012 2:09:00 PM

Hi Leah, are you and/or Elena available to discuss this afternoon? I'd be happy to help out in any way needed. FPA R2 also has Mark Madda oni and Chuck Nace, TRW Asbestos Committee members who were very active in the WTC studies — I'd want to make sure they were involved and our response was coordinated with them. Thanks,

HIL

Jill Dyken

ATSDR Division of Community Health Investigations (proposed)
Eastern Branch (Serving Communities in EPA Regions 1, 2, and 3 – Maine to Virginia)
770-488-0768 office (Mon., Tues., and Thurs.)
(b) (6) telework (Wed. and alternate Fri.)

From: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Sent: Monday, May 21, 2012 2:02 PM
To: Dyken, Jill J. (ATSDR/DCHI/EB)
Cc: Hayes, Lisa (ATSDR/DCHI/EB)
Subject: FW: Issue in Puerto Rico

Importance: High

Per our conversation.

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Monday, May 21, 2012 10:32 AM

To: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Cc: Uveges, Pam S. (ATSDR/DCHI/EB) (CTR)

Subject: Issue in Puerto Rico Importance: High

Hi Sharon,

Below I've copied and pasted an email on a building in San Juan, PR that EPA has found is contaminated with asbestos. EPA has asked for ATSDR to review the data and discuss potential health implications. I have data I can provide in another email. I was not made aware of this situation until yesterday evening, when the OSC called me at 6:00pm and advised me of the situation. The OSC, Angel Rodriguez, had apparently been advised by his senior management (Division Director and Deputy Regional Administrator- George Pavlou) that ATSDR needs to be made aware of the situation and be part of the assessment. I've also been asked to make PR DOH aware of the situation.

We need to discuss, as there is going to be a need for quick turn around, as the building is currently closed, and EPA and EQB are suggesting to the building owners that it not be re-occupied until the data can be assessed.

Thank you,

Leah

To: R2 RRC@epa.gov

From: Angel Rodriguez/R2/USEPA/US

Date: 05/16/2012 09:59AM

Cc: Adalberto Bosque/R2/USEPA/US@EPA, Ramon Torres/R2/USEPA/US@EPA, Jose

Font/R2/USEPA/US@EPA, "James" < daloia.james@epa.gov >, Eric Mosher/R2/USEPA/US@EPA. Joe Rotola/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA. Carlos Rivera/R2/USEPA/US@EPA,

Jose Soto/R2/USEPA/US@EPA. Teresita Rodriguez/R2/USEPA/US@EPA

Subject: Minillas Government Complex Asbestos Response Site, located at Jose De Diego Ave. and

Baldorioty De Castro Avenue, San Juan, Puerto Rico 00907

Good morning...Folks

On Tuesday, May 15, 2012, the EPA air program in CEPD conducted an asbestos related inspection under NESHAPS at the Minillas Government Complex located at Jose De Diego Ave. and Baldorioty De Castro Avenue, in San Juan, Puerto Rico 00907. During the inspection he found that potential ACM material was handled improperly by the ACM removal contractor to the extend that the employees and visitors could have been potentially impacted by breathing asbestos fibers in within the facility and on the outside of the main building. The contractor utilized the service elevator to transfer uncovered ACM stucco and sheet rock from the floors under abatement to bare ground along with other demolition debris on the outside premises. Evidence is visible as stated by the EPA inspector of ACM all over the building exterior as such, potential friable asbestos may be present. The EPA inspector requested the company wet down the ACM to prevent further migration of possible friable materials and to take appropriate measures to protect the employees working in the building. Approximately 2,000 employees work in the complex.

OSC Rodriguez was briefed of the situation later in the afternoon and a determination was taken by CEPD management and personnel to provide for an emergency response assessment by the CERCLA program on the following day to evaluate wether further contamination control actions needed to be in place.

On Wednesday, May 16, 2012, the OSC will conduct a removal action assessment together with the EPA air program personnel. Samples will be taken in strategic locations to evaluate the extend if any of friable ACM migration. The potential exist for closure/evacuation of some of the building's floors as determine by visual observations and the analytical sampling results.

Updates to be provided later on.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

Eng. Angel C. Rodríguez On-Scene Coordinator

Response and Remediation Branch, Caribbean Environmental Protection Division, Region 2 US Environmental Protection Agency

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(787) 671-8093 (Cell ph.) (787) 977-5830 (Office ph.)

(787) 289-7104 (Fax.) rodriguez.angel@epa.gov (e-mail)Good

From: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

To: <u>Dyken, Jill I. (ATSDR/DCHI/EB)</u>
Cc: <u>Hayes, Lisa (ATSDR/DCHI/EB)</u>

Subject: FW: Centro Minillas Asbestos ER- Preliminary Data Mandatory Evacuation - approximately potential of 2,000

evacuees (EPA to request AEP no access be allowed)

Date: Monday, May 21, 2012 2:03:13 PM

Attachments: 5.19.12- Centro Minillas ER - Preliminary Data.pdf

5.19.12- Centro Minillas ER - Preliminary Data.xls 5.16.12 - Centro Minillas- Bulk and Dust data pdf 5.16.12 - Centro Minillas- Wipes data.pdf

Here's the data. We're still waiting for the actual request. Stay tuned. Thanks.

Sharon

From: Leah Escobar [mailto:Escobar.Leah@epamail.epa.gov]

Sent: Monday, May 21, 2012 1:47 PM

To: Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

Subject: Fw: Centro Minillas Asbestos ER- Preliminary Data Mandatory Evacuation - approximately

potential of 2,000 evacuees (EPA to request AEP no access be allowed)

here is the prelim. data

---- Forwarded by Leah Escobar/R2/USEPA/US on 05/21/2012 01:46 PM ----

From Angel Rodriguez/R2/USEPA/US

To. Mark Maddaloni/R2/USEPA/US@EPA, Leah Escobar/R2/USEPA/US@EPA, George Pavlou/R2/USEPA/US@EPA

Date: 05/20/2012 06:51 PM

Sugget. Fw: Centro Minillas Asbestos ER- Preliminary Data Mandatory Evacuation - approximately potential of 2,000 evacuees

(EPA to request AEP no access be allowed)

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Thank you.

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----Forwarded by Angel Rodriguez/R2/USEPA/US on 05/20/2012 06:50PM -----

To: James Daloia/R2/USEPA/US@EPA From: Angel Rodriguez/R2/USEPA/US

Date: 05/19/2012 10:48PM

Cc: Eric Mosher/R2/USEPA/US@EPA, Jose Font/R2/USEPA/US@EPA, Joe Rotola/R2/USEPA/US@EPA, Lourdes Rodriguez/R2/USEPA/US@EPA, Adalberto Bosque/R2/USEPA/US@EPA, Ramon Torres/R2/USEPA/US@EPA, Teresita Rodriguez/R2/USEPA/US@EPA, Carlos Rivera/R2/USEPA/US@EPA, Judith Enck/R2/USEPA/US@EPA, Carolina Jordan-Garcia/R2/USEPA/US@EPA

Subject: Fw: Centro Minillas Asbestos ER- Preliminary Data Mandatory Evacuation - approximately

potential of 2,000 evacuees (EPA to request AEP no access be allowed) (See attached file: 5.19.12- Centro Minillas ER - Preliminary Data.pdf) (See attached file: 5.19.12- Centro Minillas ER - Preliminary Data.xls) (See attached file: 5.16.12 - Centro Minillas- Bulk and Dust data.pdf)

(See attached file: 5.16.12 - Centro Minillas- Wipes data.pdf)

Good evening everyone,

Please review the attached excel database table as it summarizes the asbestos analytical information for all of the collected samples.

Based on this table and to the best of my knowledge I am recommending the entire building be secured. Access must be prevented to regular employees and to anybody else which may be non-asbestos trained removal contractors.

I will be asking the Public Buildings Authority (AEP) to evacuate the premises of non asbestos qualified personnel, to provide a Work Plan, Sampling Plan and a Health and Safety Plan. Beginning immediately no access will be granted to unauthorized personnel.

All of the floors must deconned, and tested for the presence of ACM prior to reoccupation. There is a slight chance that due to the existence of 2 separated A/C distribution systems that the floors starting from the 8th floor down may be ACM free with the exception of the 1st floor which is highly contaminated with friable asbestos. Unfortunately at this time this same 1st floor eliminates the possibility of access to any other floor.

I will be issuing a Field Notice to Federal Interest tomorrow Sunday, May 20, 2012, before noon against AEP. The air program will be issuing a 114 request for information letter this week also against AEP.

I will informed everyone again tomorrow once I talk to AEP to let them know of our findings and of the EPA mandatory instructions compliance requirements.

If you have any questions please feel free to contact me at the telephone numbers listed below or simply reply by e-mail.

Thank you.

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Williams-Fleetwood, Sharon O. (ATSDR/DCHI/EB)

To: Cc: Dyken, Iill I. (ATSDR/DCHI/EB)
Hayes, Lisa (ATSDR/DCHI/EB)
FW: Issue in Puerto Rico

Subject: Date:

Monday, May 21, 2012 2:02:08 PM

Importance:

High

Per our conversation.

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Sent: Monday, May 21, 2012 10:32 AM

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EMSL Analytical, Inc.

200 Route 130 North, Cinnaminson, NJ 08077

Phone/Fax: (800) 220-3675 / (856) 786-5974

http://www.emsl.com

cinnasblab@EMSL.com

EMSL Order:

041212722 RFWE53

CustomerID: CustomerPO:

ProjectID:

Attn: Smita Sumbaly

Weston Solutions (King Georges Post) 1090 King Georges Post Road

Suite 201

Edison, NJ 08837

Phone:

(732) 585-4400

Fax: Received:

Analysis Date:

05/18/12 9:20 AM 5/18/2012

Collected

Project: RFP No. 224/ZZ/TO-0024-00xx

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 and/or EPA 600/M4-82-020 Method(s) using Polarized Light Microscopy

			Non-Asbestos			<u>Asbestos</u>	
Sample	Description	Appearance	%	Fibrous	% Non-Fibrous	% Type	
ACM-009-001 041212722-0001	9- FLOOR - CEILING HALL	White Fibrous Homogeneous	10%	. Cellulose	85% Non-fibrous (other)	5% Chrysotile	
ACM-009-002	9- FLOOR - CEILING NEXT	White Fibrous	8%	Cellulose	88% Non-fibrous (other)	4% Chrysotile	
	TO EXIT DOOR	Homogeneous	450	0 1	000/ Non-Ebreum (other)	-19/ Chrysotile	
DT-000-001 041212722-0003	GROUND FLOOR - DOOR- HALL - EXTERIOR	Gray/White/Various Fibrous Heterogeneous		Gellulose Glass	80% Non-fibrous (other)	<1% Chrysotile	
			Suggest	TEM to confirm <1 %			
DT-000-002	GROUND	Gray/White/Various	4%	Cellulose	94% Non-fibrous (other)	<1% Chrysotile	
041212722-0004	FLOOR - EXTERIOR COLLECTION AREA	Non-Fibrous Heterogeneous	2%	Glass			
			Suggest 1	TEM to confirm <1.%			

Analyst(s) Garret Viet (4)

Stephen Siegel, ClH, Laboratory Manager or other approved signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product conflication, approval, or endorsement by NVLAP. NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoloum, wallboard, etc.) are reported as a single sample. None Detected = <1% Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Codd 101048-0, AlHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872. NJ DEP 03036

Initial report from 05/18/2012 13:43:02



EMSL Analytical. Inc.

200 Route 130 North. Cinnaminson. NJ 08077

Fax: (656: 766-5974 Email cinnasblab: EMSL com

Attn: Smita Sumbaly

Weston Solutions (King Georges Post)

1090 King Georges Post Road

Suite 201

Edison, NJ 08837

Fax: Phone: (732) 585-4400

Project: RFP No. 224/ZZ/TO-0024-00xx

Customer ID

RFWE53

Customer PO: Received EMSL Order:

05/18/12 9:20 AM

041212722

EMSL Proj: Analysis Date:

8/18/2012

Test Report: Asbestos Analysis of Wipe Samples Using Method ASTM 6480-05

SAMPLE ID	AREA SAMPLED (cm²)	ASBESTOS TYPE	ASBESTOS STRUCTURES	Sensitivity (str/cm²)	CONCENTRATION (str/cm²)	COMMENTS
W-000-001 041212722-0005	100	Chrysotile	3	16200	48600	
W-000-002 041212722-0006	100	Chrysotile	<2.99	4860	<14500	
W-000-003 041212722-0007	100	None Detected	<2.99	97300	<291000	
W-007-001 041212722-0008	100	None Detected	<2.99	4860	<14500	
W-008-001 041212722-0009	100	None Detected	<2.99	1950	<5830	
W-008-002 041212722-0010	100	None Detected	<2.99	4860	<14500	
W-009-001 041212722-0011	100	Anthophyllite Chrysotile	107	12200	1310000	
W-009-002 041212722-0012	100	Anthophyllite Chrysotile	9	2160	19400	
W-009-003 041212722-0013	100	Chrysotile	4	233	932	
W-009-004 041212722-0014	100	Anthophyllite Chrysotile	108	27000	2920000	

Initial report from 05/18/2012 13:43:02

Analyst(s)

Debbie Little (10) Peter Harrison (2)

Wayne Froehlich (6)

or other approved signatory

Stephen Siegel, CIH, Laboratory Manager

Samples received in good condition unless otherwise noted. Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ

Test Report TEMMicro-7.21.0 Printed: 5/19/2012 5:37:59 PM



EMSL Analytical, Inc.

200 Route 130 North. Cinnaminson. NJ 08077

Fax: (656) 766-5974 Email cinnasblab EMSL com Phone: (800) 220-3675

Attn: Smita Sumbaly

Weston Solutions (King Georges Post) 1090 King Georges Post Road

Suite 201

Fax:

Edison, NJ 08837

Phone: (732) 585-4400

Project: RFP No. 224/ZZ/TO-0024-00xx

Customer ID:

RFWE53

Customer PO: Received

05/18/12 9:20 AM

EMSL Order:

041212722

EMSL Proj:

Analysis Date:

8/18/2012

Test Report: Asbestos Analysis of Wipe Samples Using Method ASTM 6480-05

SAMPLE ID	AREA SAMPLED (cm²)	ASBESTOS TYPE	ASBESTOS STRUCTURES	Sensitivity (str/cm²)	CONCENTRATION (str/cm²)	COMMENTS
W-009-005 041212722-0015	100	Anthophyllite Chrysotile	30	24300	729000	
W-010-001 041212722-0016	100	None Detected	<2.99	4860	<14500	
W-010-002 041212722-0017	100	Nane Detected	<2.99	9730	<29100	
W-011-001 041212722-0018	100	None Detected	<2.99	48600	<145000	
W-011-002 041212722-0019	100	Chrysotile	<2.99	1950	<5830	
W-0E3-001 041212722-0020	100	Anthophyllite Chrysotile	3	1950	5850	
W-OSE-001 041212722-0021	100	Chrysotile	16	1950	31200	
W-BLANK-001 041212722-0022	100	Chrysotile	<2.99	486	<1450	

Initial report from 05/18/2012 13:43 02

Analyst(s)

Debbie Little (10)

Wayne Froehlich (6)

Peter Harrison (2)

or other approved signatory

Stephen Siegel, CIH, Laboratory Manager

Samples received in good condition unless otherwise noted. Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ

Test Report TEMMicro-7.21.0 Printed: 5/19/2012 5:37:59 PM

THIS IS THE LAST PAGE OF THE REPORT.

Centro Minillas ER - May 16, 2012

Sample Number	Matrix	Floor	Location	Abestos Type	*Concentra
ACM-009-001	Bulk	9	Ceiling Hall	(5%) Chrysotile	
ACM-009-002	Bulk	9	Ceiling next to exit door	(4%) Chrysotile	
DT-000-001	Dust	Ground	Exit Door-Hall-Exterior	(<1%) Chrysotile	
DT-000-002	Dust	Ground	Exterior Collection Area	(<1%) Chrysotile	
W-000-001	Wipe	Ground	Service Elevator Floor Entrance	Chrysotile	
W 000 002	Wipe	Ground	Decorative wall	Chrysotile	
W-000-003	Wipe	Ground	Bookshelf	None Detected	
W-007-001	Wipe	7	A/C Reception vent	None Detected	
W-008-001	Wipe	8	A/C Reception vent	None Detected	
W-008-002	Wipe	8	Elevator Front Frame	None Detected	
W-009-001	Wipe	9	Floor-Collection area	Anthophyllite / Chrysotile	
W-009-002	Wipe	9	Chair by elevator	Anthophyllite / Chrysotile	
W-009-003	Wipe	9	Plastic sheet-exit door	Chrysotile	
w 009 004	Wipe	9	Light fixture	Anthophyllite / Chrysotile	
W-009-005	Wipe	9	A/C vent by Mechanical room	Anthophylite / Chrysotile	
W-010-001	Wipe	10	Elevator Front Frame	None Detected	
W-010-002	Wipe	10	Secretary desk	None Detected	
W-011-001	Wipe	11	Elevator Front Frame	None Detected	
W-011-002	Wipe	11	Secretary desk	Chrysotile	
W-0E3-001	Wipe	Elevator No.3	Door Frame right Anthophyllite / Chrysotile		
W-05E-001	Wipe	Service Elevator			
W-BLANK-CO1	Laboratory QC			Chrysotile	

^{*}This data have not been through any form validation, data review, or quality assessment, they should be solely used for screening and/or informational purposes and definitive environmental decisions.

Centro Minillas ER - May 16, 2012

Sample Number	Matrix	Floor	Location	Abestos Type	*Concentrat
ACM-009-001	Bulk	9	Ceiling Hall	(5%) Chrysotile	
ACM-009-002	Bulk	9	Ceiling next to exit door	(4%) Chrysotile	
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DT-000-002	Dust	Ground	Exterior Collection Area	(<1%) Chrysatile	
W-000-001	Wipe	Ground	Service Elevator Floor Entrance	Chrysotile	
W-000-002	Wipe	Ground	Decorative wall	Chrysotile	
W-000-003	Wipe	Ground	Bookshelf	None Detected	
W-007-001	Wipe	7	A/C Reception vent	None Detected	
W-008-001	Wipe	8	A/C Reception vent	None Detected	<u></u>
W-008-002	Wipe	8	Elevator Front Frame	ame None Detected	
W-009-001	Wipe	9	Floor-Collection area	area Anthophyllite / Chrysotile	
W-009-002	Wipe	9	Chair by elevator	Anthophyllite / Chrysotile	
W-009-003	Wipe	9	Plastic sheet-exit door	Chrysotile	
w-009-004	Wipe	9	Light fixture	Anthophyllite / Chrysotile	
W-009-005	Wipe	9	A/C vent by Mechanical room	Anthophyllite / Chrysotile	
W-010-001	Wipe	10	Elevator Front Frame	Nane Detected	
W-010-002	Wipe	10	Secretary desk	None Detected	4
W-011-001	Wipe	11	Elevator Front Frame	Elevator Front Frame None Detected	
W-011-002	Wipe	11	Secretary desk Chrysotile		
W-0E3-001	Wipe	Elevator No.3	Door Frame right Anthophyllite / Chrysotile		
W-05E-001	Wipe	Service Elevator	Floor corner Chrysotile		
W-BLANK-001	Laboratory QC			Chrysotile	

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